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ABSTRACT

This General Accounting Office report to two U.S. Senate subcommittees examines: (1) the economic and demographic characteristics of child workers; (2) serious injuries sustained by illegally employed children; and (3) the Labor Department's policy with regard to penalizing employers who illegally employ children. Federal child labor regulations are reviewed, the objectives and scope of the study are discussed, and the enforcement efforts of the Labor Department's Operation Child Watch are summarized. The results of the study indicated that: (1) low-income and minority children were less likely to be employed than high-income and white children; (2) more children from low-income than from high-income families worked in hazardous industries; (3) about 18 percent of working 15-year-olds worked in violation of child labor laws; (4) although the number of serious injuries to illegally employed children increased, the ratio of serious injuries to detected violations declined between 1983 and 1990; (5) most violations involving serious injuries of working children are associated with hazardous order violations; and (6) the Labor Department imposed the maximum penalty for nonwillful violations, but cited no cases of willful violation, during fiscal year 1990. (BC)

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United States General Accounting Office

GAO

Briefing Report to Congressional Requesters

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June 1991

CHILD LABOR

Characteristics of Working Children

PS 019837

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GAO/HRD-91-83BR

GAO

United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-243274

June 14, 1991

The Honorable Christopher J. Dodd
Chairman, Subcommittee on Children,
Family, Drugs and Alcoholism
Committee on Labor and Human Resources
United States Senate

The Honorable Howard M. Metzenbaum
Chairman, Subcommittee on Labor
Committee on Labor and Human Resources
United States Senate

In response to your request and after discussions with your offices, we examined (1) the economic and demographic characteristics of child workers, (2) the number of serious injuries sustained by children detected by the Department of Labor as being illegally employed, and (3) Labor's policy with regard to penalizing employers illegally employing children who sustain serious injuries and to child labor violations generally.

We reported our preliminary results in a briefing with your offices on February 6, 1991. Also, at your request we submitted testimony for the record on our preliminary results on March 19, 1991, during the joint hearings before your two Subcommittees. This report presents our final results (see app. I).

Results in Brief

According to Bureau of the Census data, about 28 percent of all 15-year-olds and 51 percent of all 16- to 17-year-old children were employed some time during 1988. Children from low-income families (those with annual incomes of $20,000 or less) were less likely to be employed than children from high-income families (those with annual incomes above $60,000). Minority children were less likely to be employed than white children. When employed, children from low-income families were more likely to be employed in agriculture or other "hazardous" industries, such as manufacturing or construction. They also worked more hours a week but fewer weeks a year than children from high-income families.

We estimate that, in 1988, about 18 percent of employed 15-year-olds worked in violation of federal child labor regulations governing maximum hours or minimum ages for employment in certain occupations.

During the period of fiscal years 1983-90, Labor detected 1,475 violations associated with serious workplace injuries[1] of working children.

In those fiscal year 1990 inspections where Labor could readily identify the assessed fines, it assessed the maximum nonwillful violation penalty of $1,000 against only child labor violators employing a child who was seriously injured. Labor did not cite any of these employers for willful violations (for which the penalty could have been $10,000), nor did it refer any for criminal prosecution.[2]

Background

The Fair Labor Standards Act (FLSA) is the primary federal law regulating wages and working conditions of American workers, including children. Regulations issued under the act set a minimum age requirement for work in certain occupations (minimum age/prohibited occupation regulations), limit the hours during which 14- and 15-year-old youth can work (hours regulations), and restrict employment in specific hazardous occupations for youth under age 18 (hazardous order regulations) (see app. II for summary of regulations). The Wage and Hour Division (WHD), within Labor's Employment Standards Administration, is responsible for the administration and enforcement of FLSA, including child labor regulations. In fiscal year 1990, WHD had about 1,000 compliance officers to enforce the FLSA, including the act's child labor provisions.

Since 1974, FLSA has authorized Labor to assess a maximum civil monetary penalty of $1,000 for each violation of federal child labor regulations, unless the violation was deemed willful, in which case a $10,000 penalty could be assessed. However, assessed penalties in cases involving most child labor violations are far lower than the statutory maximums. For example, the average assessed penalty per illegally employed minor in fiscal year 1990 was about $283 (the average assessed penalty per violation was about $212.)

As part of the fiscal year 1991 budget legislation, the Congress gave Labor the authority to assess a maximum civil monetary penalty of up

[1]Consistent with Labor's definition, we defined serious injury as either (1) an injury that caused the loss of at least 1 working day by the child, (2) a permanent total or partial disability, or (3) a fatality. Although Labor records each detected serious injury, it does not compile aggregate statistics on the number of injuries, disabilities, or deaths.

[2]Labor has followed the definition of "willful" stated in a 1988 Supreme Court decision, McLaughlin v. Richland Shoe Co., 108 S.Ct 1677 (1988): ". . . knowledge [knew] or showed reckless disregard for the matter . . ."

to $10,000 for each child who was the subject of a nonwillful child labor violation.[3] Reflecting the legislated increase in the maximum civil monetary penalty, Labor now has modified its policy. As of March 1991, Labor said that it would assess maximum civil monetary penalties of $10,000 in cases where an illegally employed child is fatally injured and $7,500 to $10,000 where an illegally employed child suffers a permanent disability. Finally, it plans to assess a minimum penalty of $5,000 in cases where an illegally employed child suffers a serious injury resulting in lost worktime.

Despite this new authority to raise penalties for all nonwillful violations tenfold—up to $10,000 from the previous $1,000 maximum—Labor generally has chosen to increase assessed penalties for violations that do not involve a serious injury by far smaller amounts. Labor doubled the scheduled assessed penalties for a violation of a hazardous order regulation from $500/$750 to $1,000/$1,500, depending on the age of the child. It only increased penalties for an hours violations for 14- and 15-year-olds from $300/$350 to $400/$450—a 28- to 33-percent increase. Labor also increased the maximum assessed penalty for a minimum age violation from 40 to 50 percent—from a maximum of $400/500 to $600/700, depending upon the age of the child.

Scope and Methodology

As a result of interviews with experts inside and outside the federal government, we turned to three data sources in meeting our study objectives:

1. The Bureau of the Census's March 1989 Supplement to the Current Population Survey (CPS). We obtained and analyzed national demographic and economic data to determine the profile of working children. (See app. III and IV.)

2. Department of Labor child labor inspection records. We identified illegally employed children who sustained serious injuries and the total number of detected violations for fiscal years 1983-1990.

[3]This change is consistent with GAO's 1990 proposal that the Congress consider increasing penalties for federal child labor violations if it deems Labor's administrative efforts as failing to secure sufficient deterrence. See Child Labor: Increases in Detected Child Labor Violations Throughout the United States (GAO/HRD-90-116, Apr. 1990).

3. Labor's fiscal year 1990 Operation Child Watch (OCW) enforcement sweep records.[4] We obtained information on assessed penalties associated with serious injuries of illegally employed children detected during the sweep. (See app. V for a summary of sweep enforcement efforts).

Data points for all figures in appendix I appear in appendix VI.

Principal Findings

Low-Income and Minority Children Less Likely to Be Employed

Our analysis of the CPS data shows that 28 percent of all 15-year-olds (over 919,000) and 51 percent of all 16- to-17-year olds (over 3.5 million) worked some time during 1988. Children aged 15 to 17 years from families with annual incomes of $20,000 or less (low-income families) were less likely to be employed than those from high-income (over $60,000 in annual income) families. Of the over 3 million 15- to 17-year-old children living in low-income families, 32 percent were employed at some time in 1988, compared with 54 percent of the 1.9 million children from high-income families. Minority children aged 15 to 17 years were employed at a lower rate than white children in the same age group in 1988. About 28 percent of both black and Hispanic children were employed, compared with 50 percent of white children.

Type and Amount of Work Differ by Child's Family Income

In 1988, most 15- to 17-year-olds were employed in such industries as retail trade (48 percent) and personal, professional, and repair services (25 percent), but the type of employment varied by family income. More children from low-income families than from high-income families (20 versus 14 percent) worked in "hazardous" industries such as agriculture, mining, manufacturing, construction, and wholesale trade, including warehouse operations.

In 1988, 15-year-old employed children worked an average of 17 hours a week and 19 weeks a year; employed 16- and 17-year-olds worked an average of 21 hours a week and 23 weeks a year. Because the CPS data base does not distinguish between employment during nonschool and school year periods, we could not estimate the amount of work during the school year alone.

[4]In 1990, Labor conducted a series of four nationwide strike force sweeps to detect child labor violations and take remedial actions against child labor law violators.

The number of hours worked a week and weeks worked a year by children varied by the family income of the child. In 1988, employed 15- to 17-year-old children from low-income families averaged 22 hours of work a week; children from high-income families averaged 19 hours a week. In contrast, employed children in low-income families averaged fewer weeks of work a year than children from high-income families—20 versus nearly 23 weeks.

GAO Estimate of Illegal Employment

Using the Current Population Survey,[5] we estimated that in 1988 about 18 percent of all employed 15-year-olds (about 166,000) were working in violation of the regulations governing either maximum hours of work or the minimum age for employment. About 9 percent worked at least some time in violation of the federal maximum hours regulation, and almost 11 percent worked in violation of the federal minimum age regulation prohibiting 15-year-olds from employment in certain occupations. Some worked in violation of both. (See app. III for estimating methodology.)

Trends in Detected Illegally Employed Children Who Sustained Serious Injuries

Between fiscal years 1983 and 1990, the Department of Labor detected a total of 1,475 serious injuries of illegally employed children. Since fiscal year 1983, the annual number of detected illegally employed children sustaining serious injuries has doubled (from 143 to 288). However, the annual number of detected violations increased by a much greater rate—more than fourfold (42,696 in 1990 compared with 9,679 in 1983).[6] Thus, the percentage of child labor law violations involving serious injuries was smaller in fiscal year 1990 than in 1983.

Serious Injuries Differ by Type of Violation and Industry

Most violations involving serious injuries of working children are associated with hazardous order violations. Between fiscal years 1983 and 1990, over 85 percent of all violations involving serious injuries were associated with a hazardous order violation, although these comprised only 32 percent of all child labor violations. Fewer than 15 percent of all serious injuries were associated with minimum age and maximum hours violations, although they comprised 68 percent of all child labor violations.

[5]Because of limitations in the CPS data base, this estimate may understate the number of 15-year-olds employed in violation of federal child labor regulations. The CPS data base does not obtain employment information directly from the child but from a parent or other proxy respondent, who, researchers claim, often under-reports the total amount of youth employment. (See app. III.)

[6]The greatest percentage increase in violations occurred in hours violations, which are less often related to serious injuries.

Detected violations associated with serious injury also differ by industry. Between fiscal years 1983 and 1990, about 27 percent of all injuries associated with child labor violations occurred in construction and manufacturing industries, even though employment in those industries accounted for only 4 percent of all detected child labor violations.

Penalties Assessed for Serious Injury Cases

In fiscal year 1990, Labor followed a policy of imposing the maximum penalty for a nonwillful violation on businesses that illegally employed children who sustained a serious injury, regardless of the nature of the serious injury.[7]

Because Labor does not routinely keep penalty information on individual cases, we were unable to determine whether this policy was enforced in all child labor cases. However, Labor did keep data on penalties for the portion of its fiscal year 1990 inspections conducted under Operation Child Watch. This effort consisted of four nationwide "strike force" enforcement sweeps that included 9,524 inspections and found 27,634 children illegally employed. In those inspections, Labor assessed the maximum nonwillful violation penalty of $1,000 for all 50 violations associated with a serious injury. Labor cited no willful violations (for which the penalty could have been $10,000), nor did it refer for criminal prosecution any case in fiscal year 1990 that involved the serious injury of an illegally employed minor.

[7]The average assessed penalty for violations that did not involve a serious injury was far less than $1,000.

As agreed, we did not obtain written agency comments on this report. We did, however, discuss its contents with WHD officials and incorporated their suggestions where appropriate.

As arranged with your offices, we are sending copies of this report to the Secretary of Labor and other interested parties. If you have any questions concerning this report, please call me at (202) 275-1793. Other major contributors to this report are listed in appendix VII.

Franklin Frazier

Franklin Frazier
Director, Education
and Employment Issues

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Abbreviations

CPS	Current Population Survey
FLSA	Fair Labor Standards Act
GAO	General Accounting Office
NLS	National Longitudinal Survey
OCW	Operation Child Watch
WHD	Wage and Hour Division
WHMIS	Wage and Hour Management Information System

Child Labor: Characteristics of Working Children

Figure I.1:

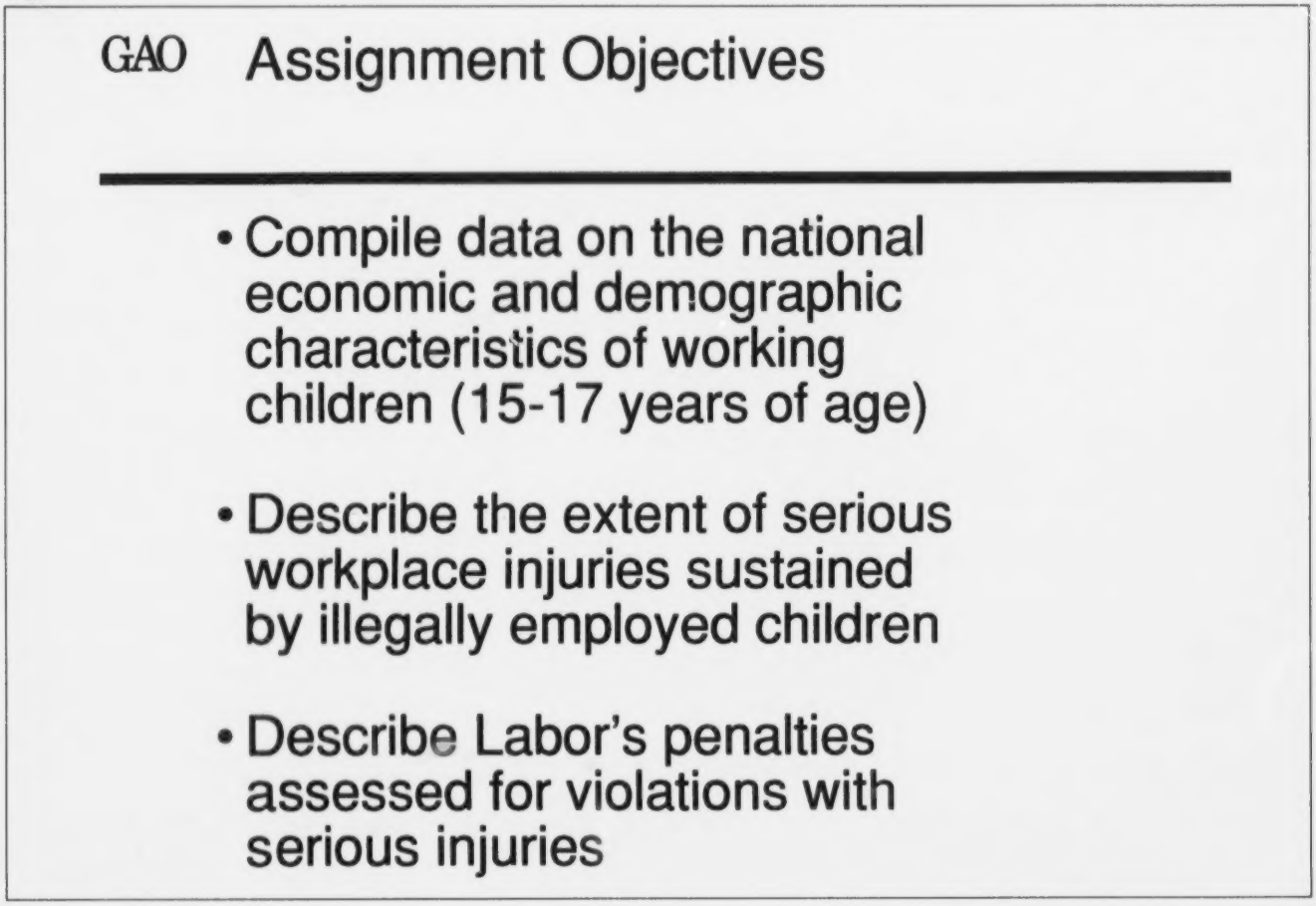
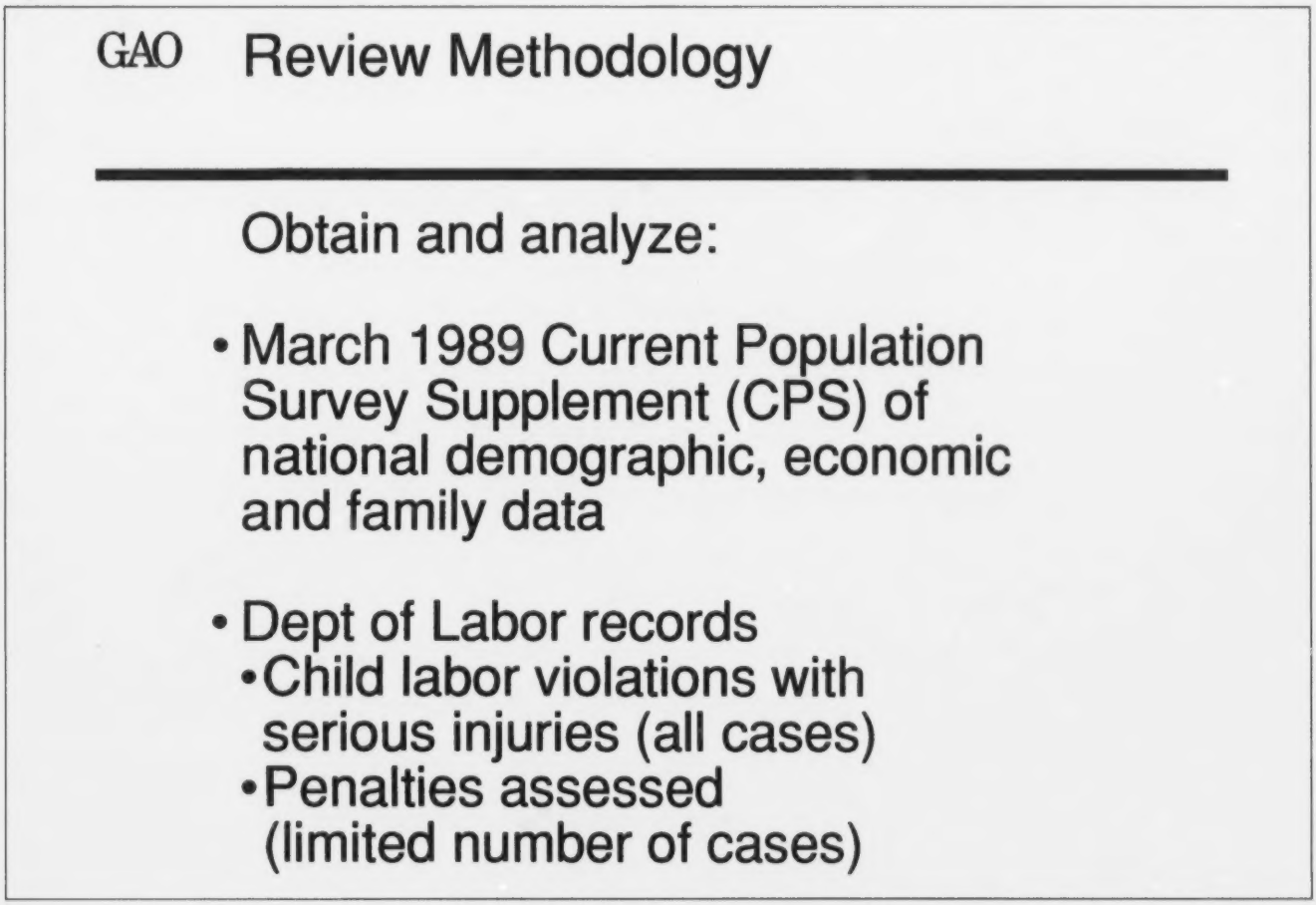

GAO
Assignment Objectives
• Compile data on the national economic and demographic characteristics of working children (15-17 years of age)
• Describe the extent of serious workplace injuries sustained by illegally employed children
• Describe Labor's penalties assessed for violations with serious injuries

Figure I.2:


GAO
Review Methodology
Obtain and analyze:
• March 1989 Current Population Survey Supplement (CPS) of national demographic, economic and family data
• Dept of Labor records
•Child labor violations with serious injuries (all cases)
•Penalties assessed (limited number of cases)

Note: We describe the limitations and strengths of the CPS data base in apps. III and IV. For example, it does not distinguish between employment performed during nonschool and school year periods. Thus, we could not estimate the amount of employment that children performed during the school year alone. In addition, because the CPS does not directly interview the child about his or her employment experience, it may underestimate the amount of work performed by children during the year. In general, our analysis includes children employed in both agriculture and nonagricultural industries, except where we present information on the average number of hours worked a week and the number of weeks worked a year, which is based on nonagricultural employment only.

Labor does not routinely maintain at headquarters penalty data for individual child labor cases. Penalty data were available only for those investigations performed during Labor's fiscal year 1990 Operation Child Watch enforcement efforts.

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Figure I.3:

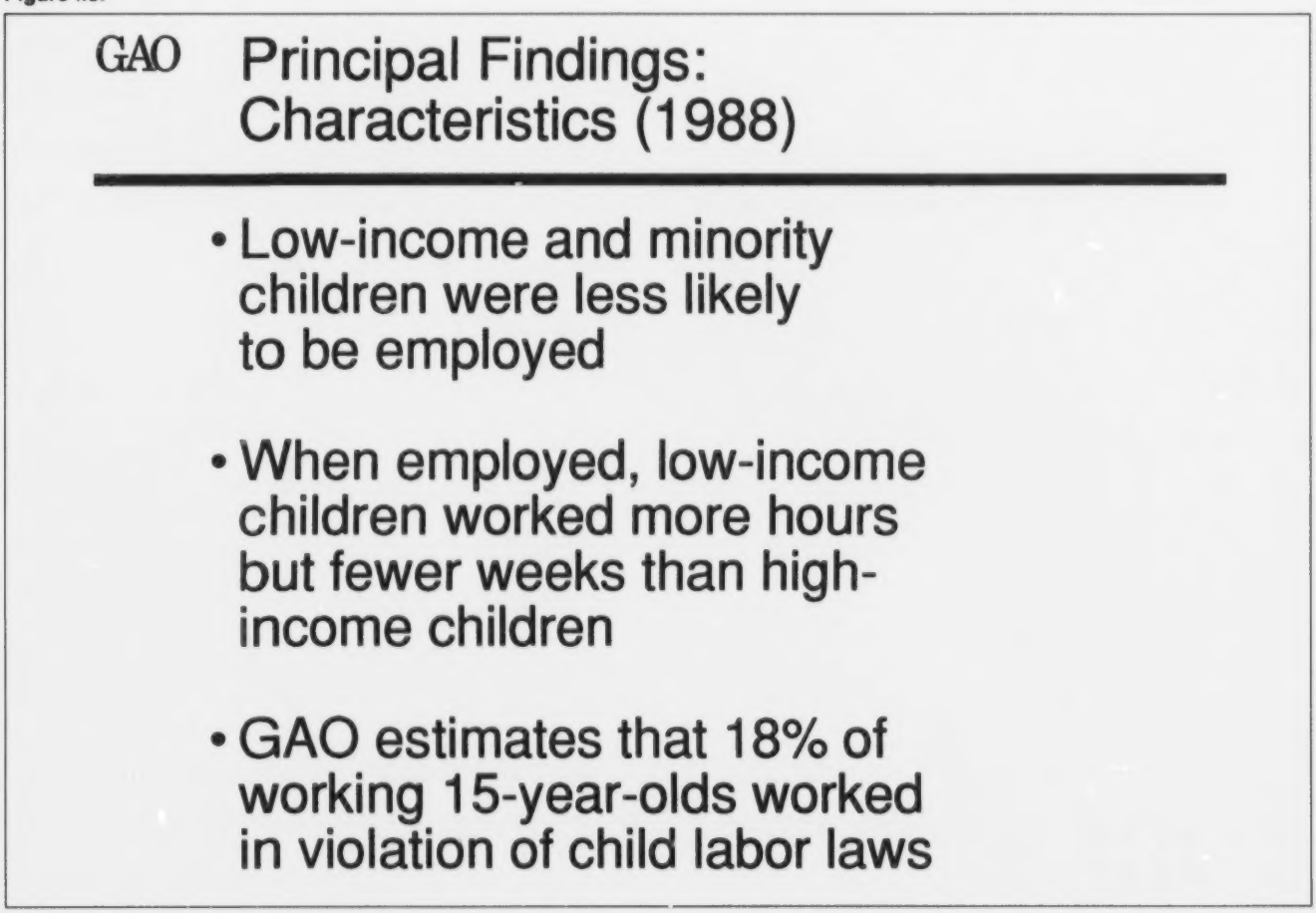

GAO
Principal Findings:
Characteristics (1988)
• Low-income and minority children were less likely to be employed
• When employed, low-income children worked more hours but fewer weeks than high-income children
• GAO estimates that 18% of working 15-year-olds worked in violation of child labor laws

Figure I.4:

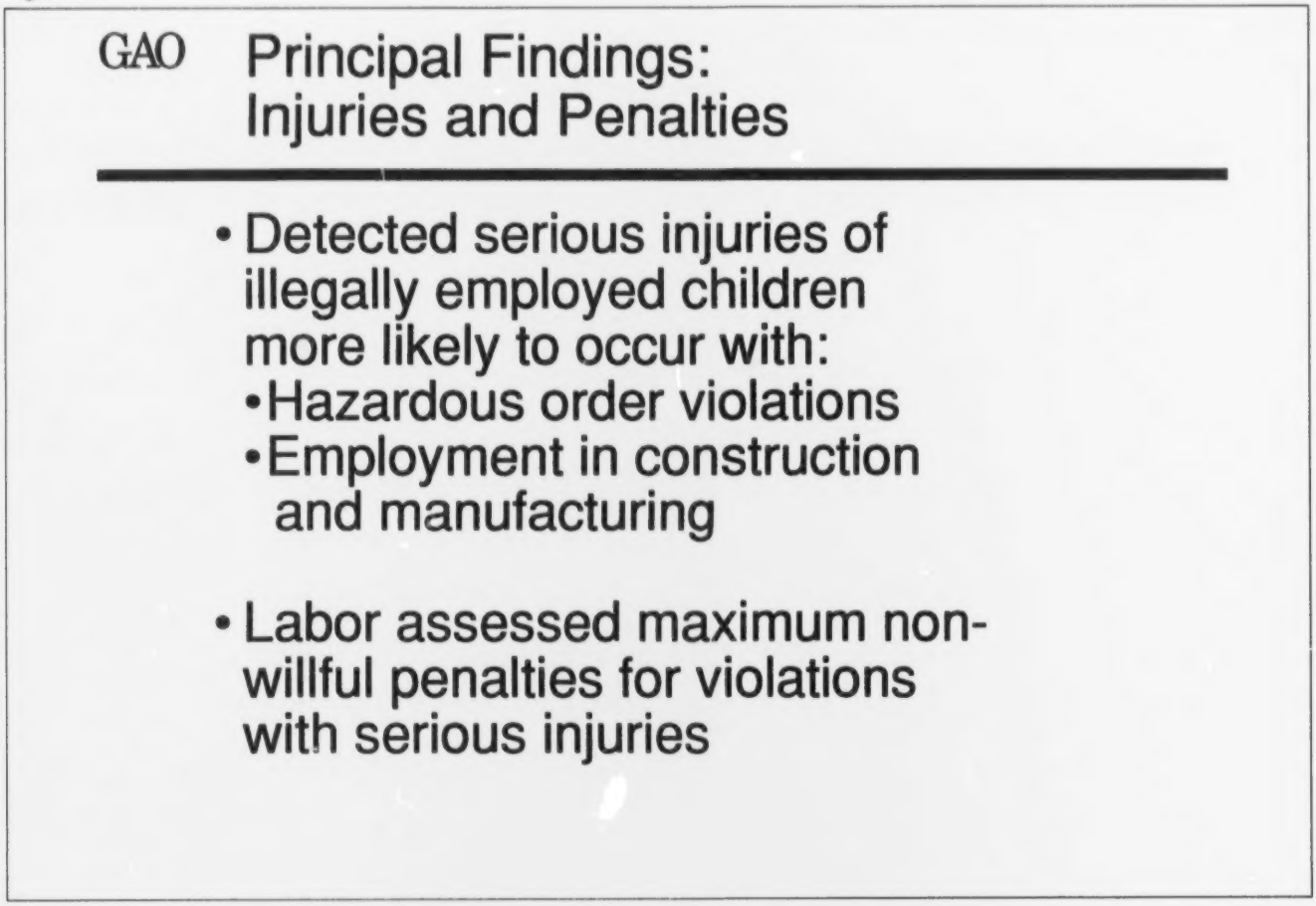
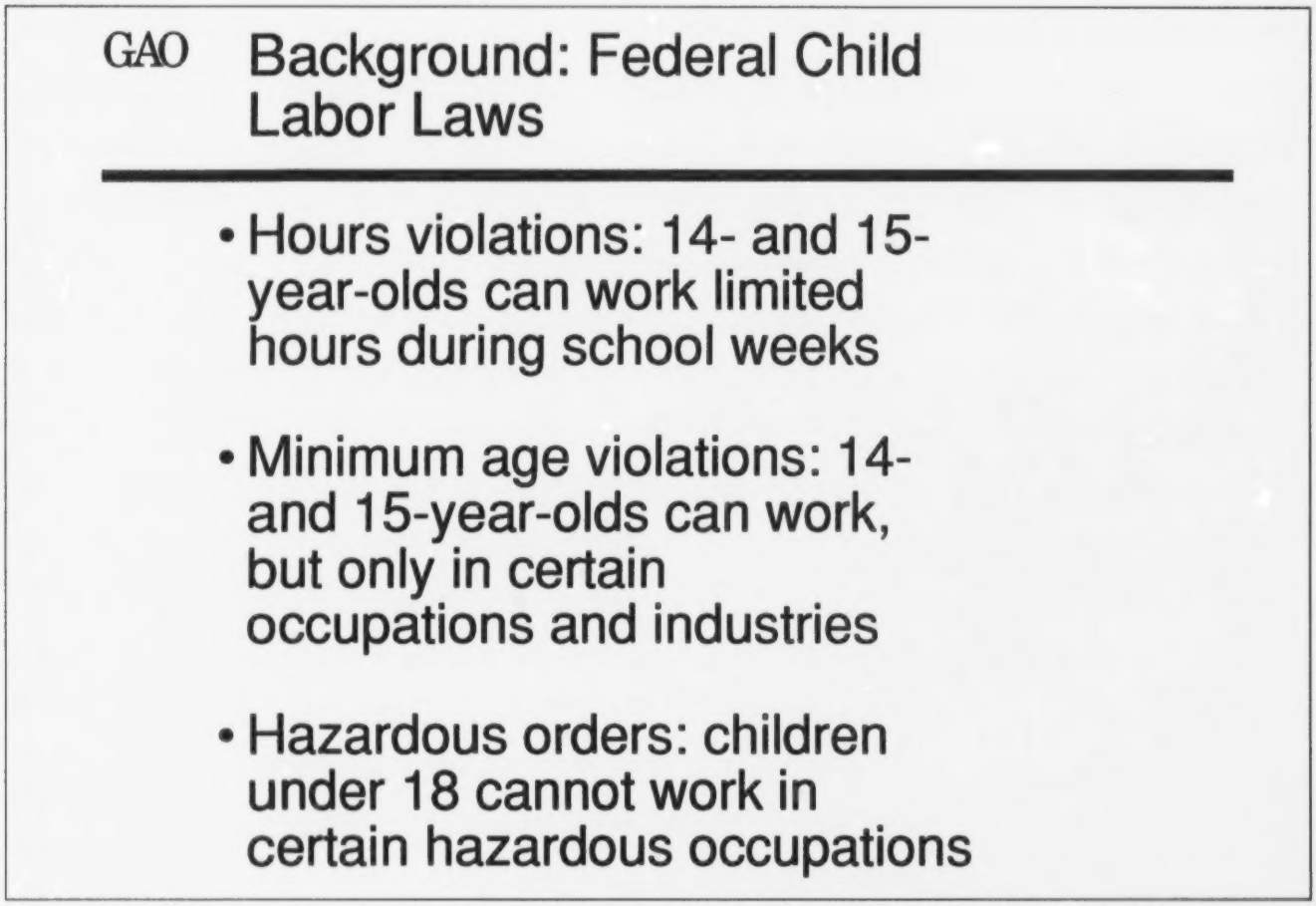

GAO
Principal Findings:
Injuries and Penalties
• Detected serious injuries of illegally employed children more likely to occur with:
•Hazardous order violations
•Employment in construction and manufacturing
• Labor assessed maximum non-willful penalties for violations with serious injuries

Figure I.5:


GAO
Background: Federal Child Labor Laws
• Hours violations: 14- and 15-year-olds can work limited hours during school weeks
• Minimum age violations: 14- and 15-year-olds can work, but only in certain occupations and industries
• Hazardous orders: children under 18 cannot work in certain hazardous occupations

Note: All three types of violations apply to the employment of children covered by FLSA in nonagricultural industries. The child labor provisions of FLSA do not apply to children under 16 employed by their parents in occupations other than those in manufacturing or mining or occupations declared to be hazardous; children employed as actors or performers in motion pictures and other productions; or children engaged in the delivery of newspapers to the consumer or in making evergreen wreaths. (See app. II.)

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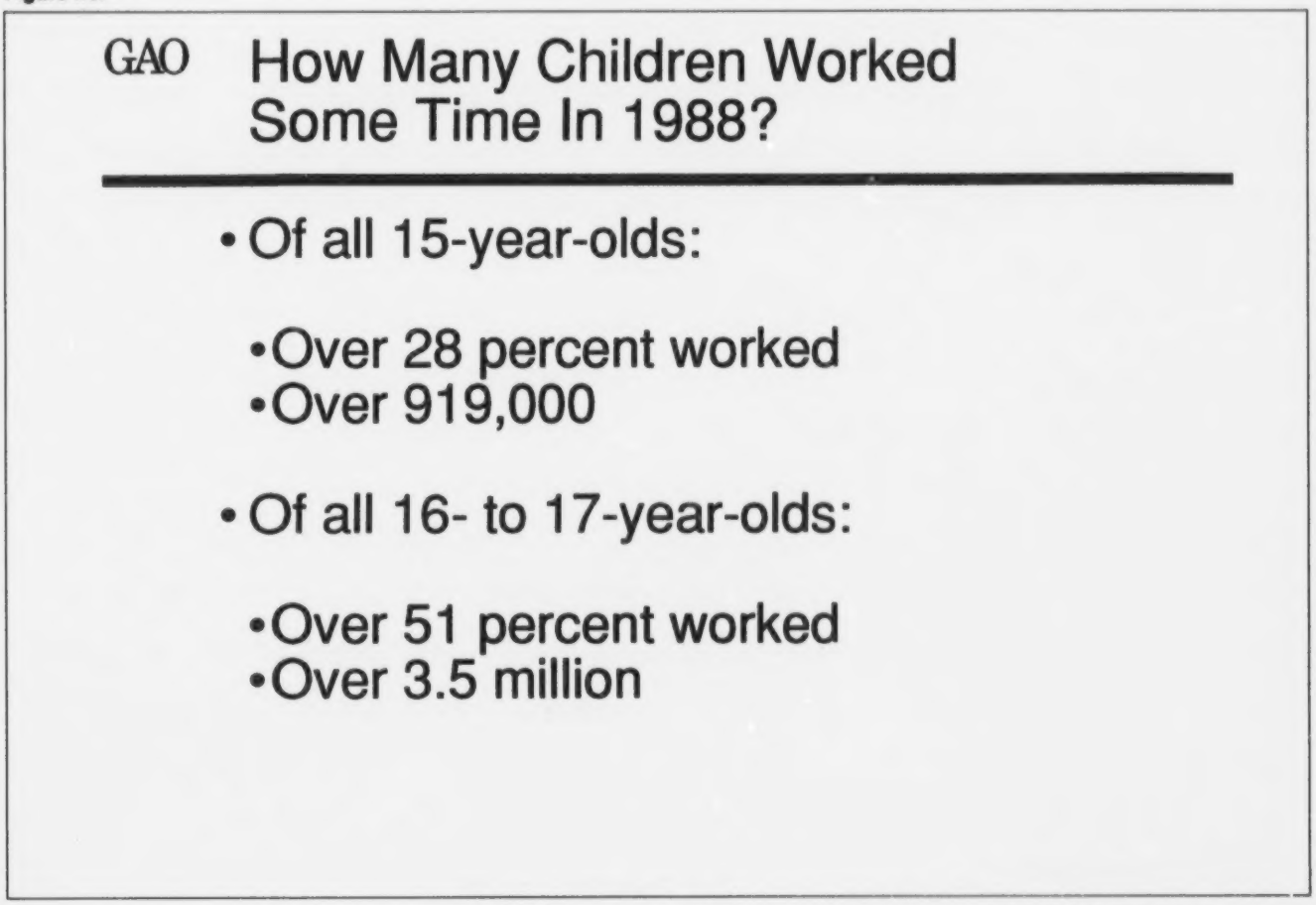
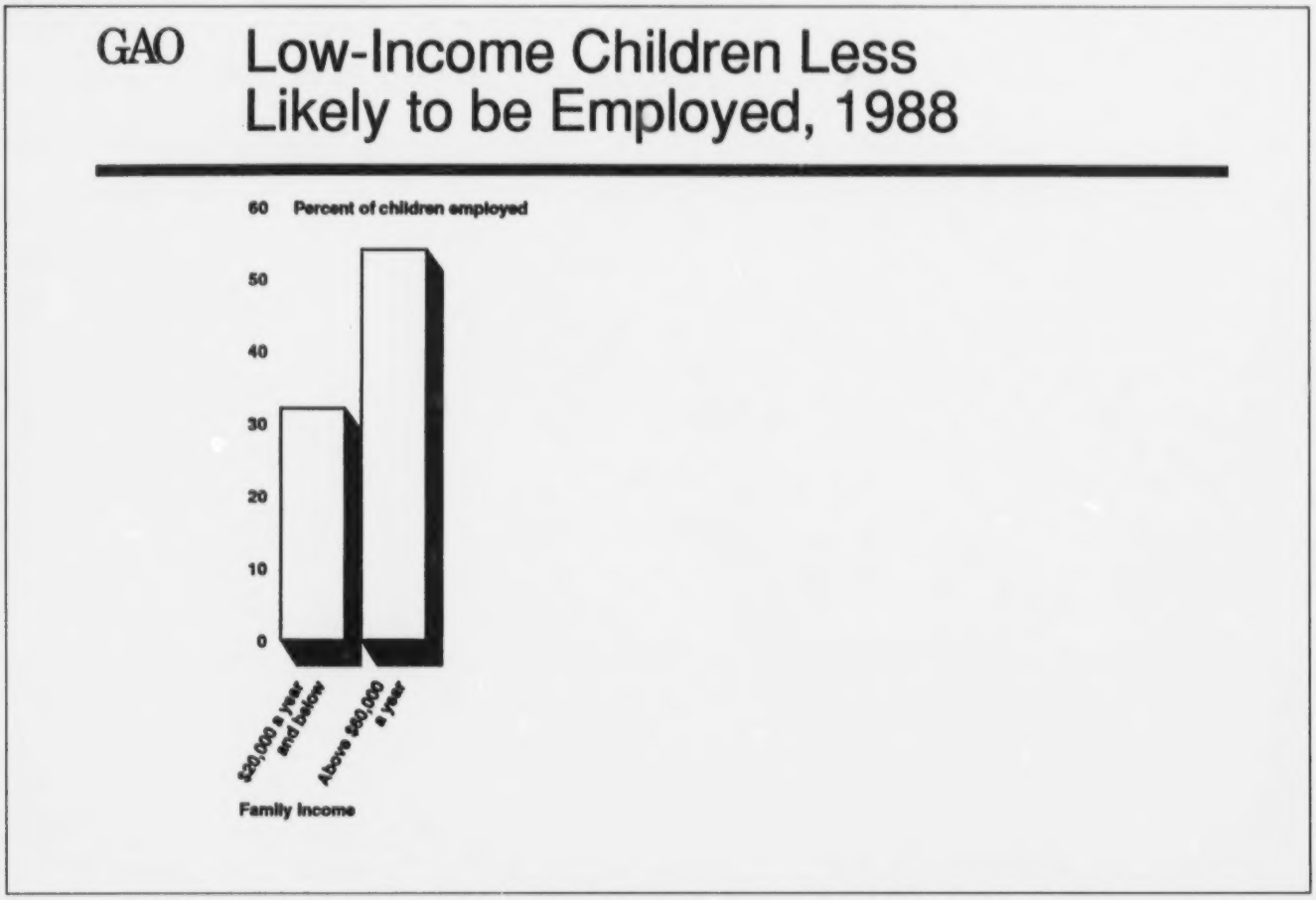
Figure I.6:


GAO
How Many Children Worked Some Time In 1988?
• Of all 15-year-olds:
•Over 28 percent worked
•Over 919,000
• Of all 16- to 17-year-olds:
•Over 51 percent worked
•Over 3.5 million

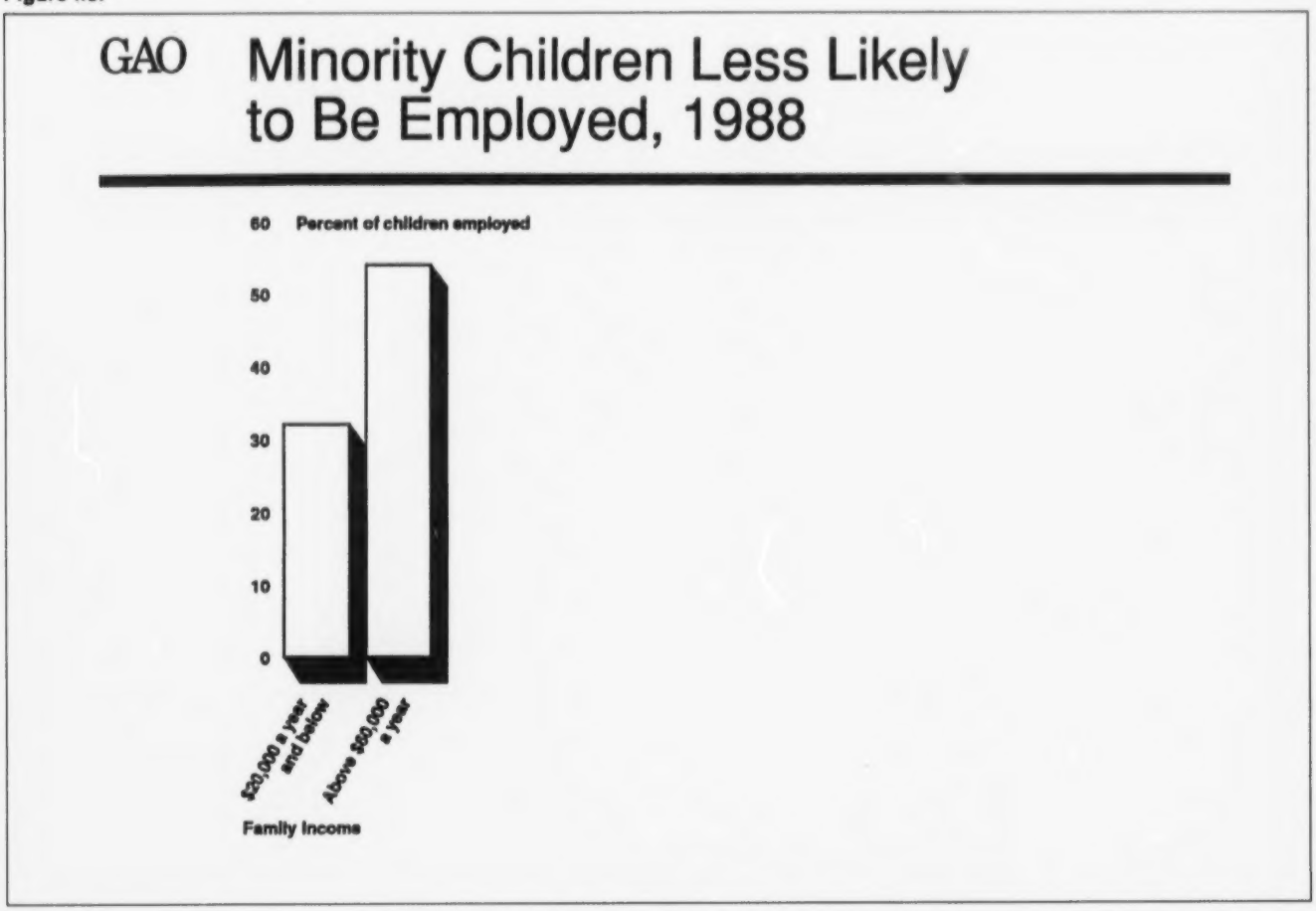
Note: CPS data showed 919,691 15-year-olds and 3,550,041 16- to 17-year-olds were employed at least some time during 1988. The associated sampling errors were +/-2.4 percent and +/-1.8 percent.

Figure I.7:



Note: This chart represents all employed 15- to 17-year-old children from families in each income group as a percent of all 15- to 17-year-olds in that income group. Fifteen- to 17-year-old children from low-income families were less likely to be employed than children from high-income families in 1988 (32 vs. 54 percent). The associated sampling errors were +/-2.6 percent and +/-3.5 percent. (See app. VI.)

Figure I.8:



Note: This chart represents all employed 15- to 17-year-olds as a percent of all 15- to 17-year-olds from each race category. Almost 50 percent of all white 15- to 17-year-olds were employed at least some time during 1988, compared with about 28 percent of all black and Hispanic 15- to 17-year-olds. The associated sampling errors ranged from +/-1.8 to +/-7.1 percent. (See app. VI.)

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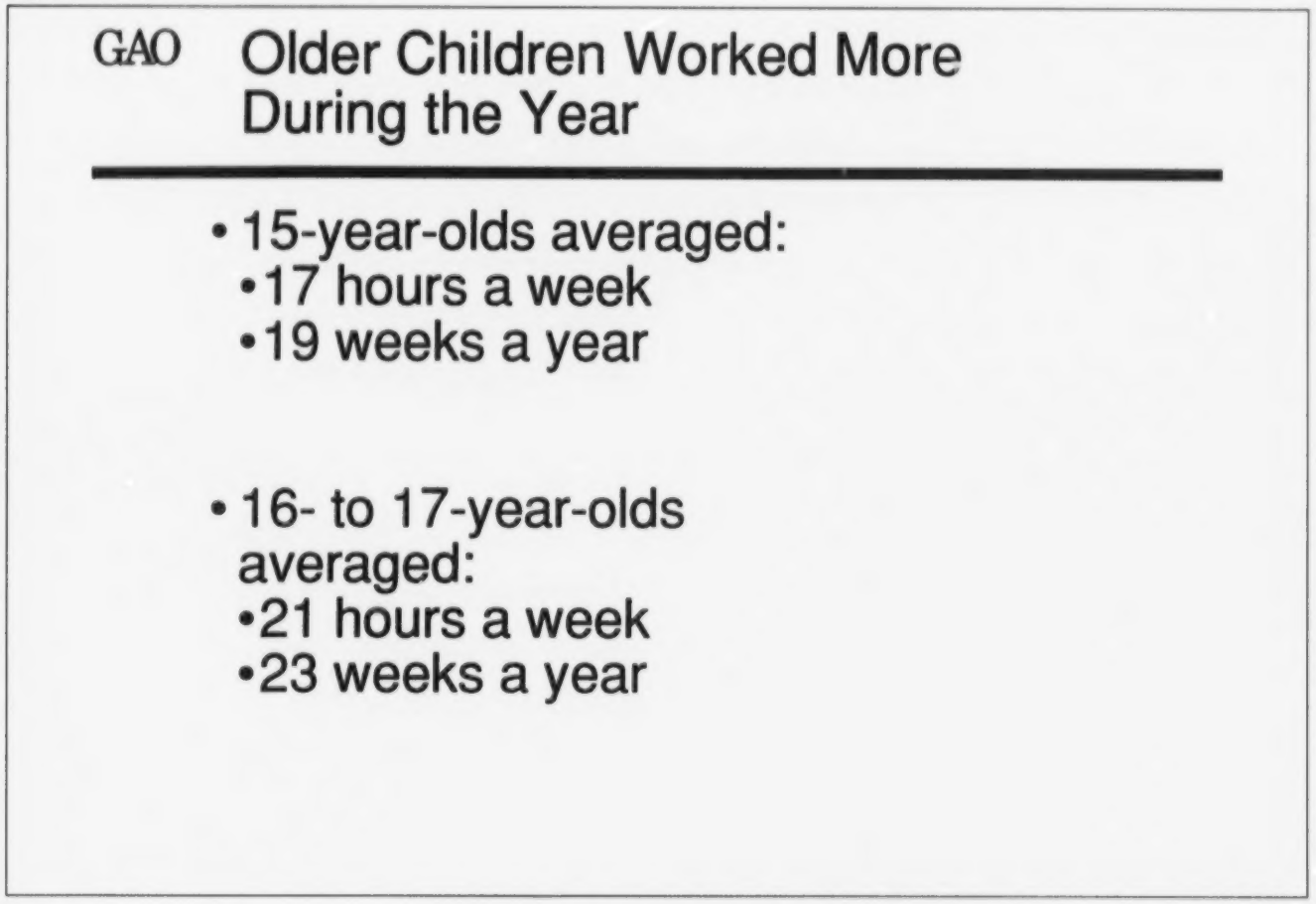
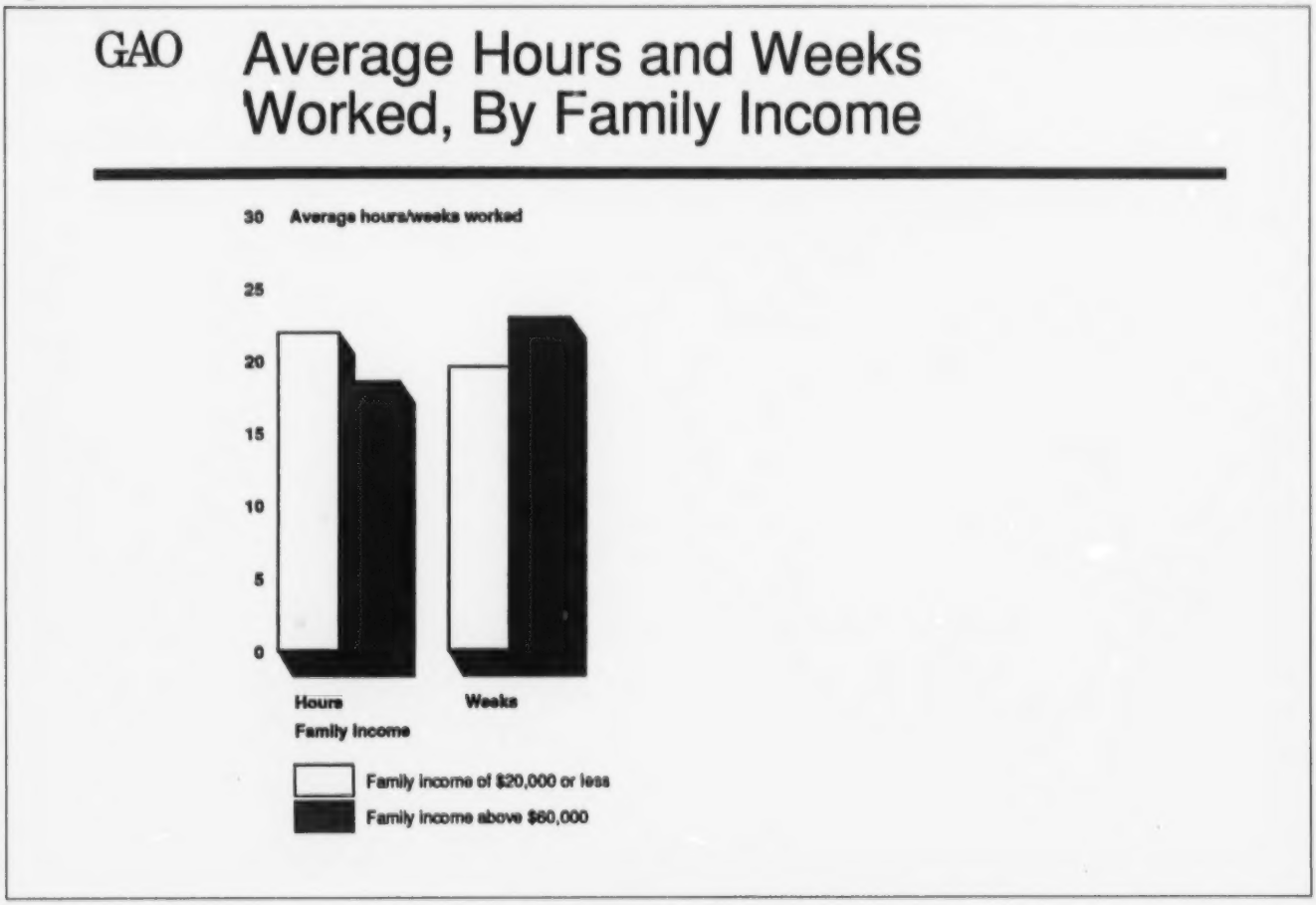
Figure I.9:


GAO
Older Children Worked More During the Year
• 15-year-olds averaged:
•17 hours a week
•19 weeks a year
• 16- to 17-year-olds averaged:
•21 hours a week
•23 weeks a year

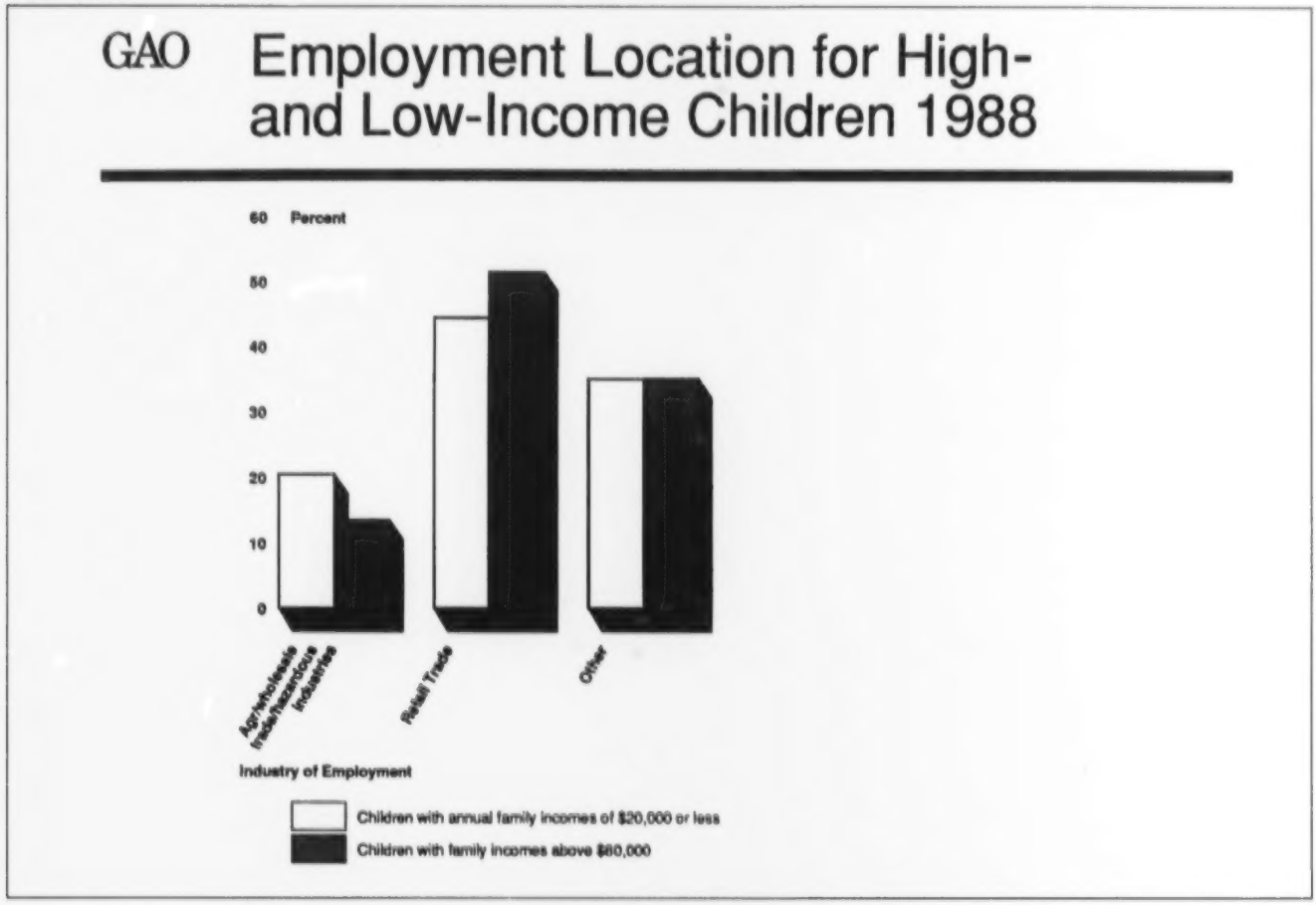
Note: We examined the average number of hours and weeks worked by 15- to 17-year-olds in nonagricultural industries only. For 15-year-olds employed in nonagricultural industries, the associated sampling errors were +/-1.9 hours per week and +/-2.1 weeks. For 16- to 17-year-olds, the associated sampling errors were +/-1.1 hours per week and +/-1.3 weeks per year.

Figure I.10:



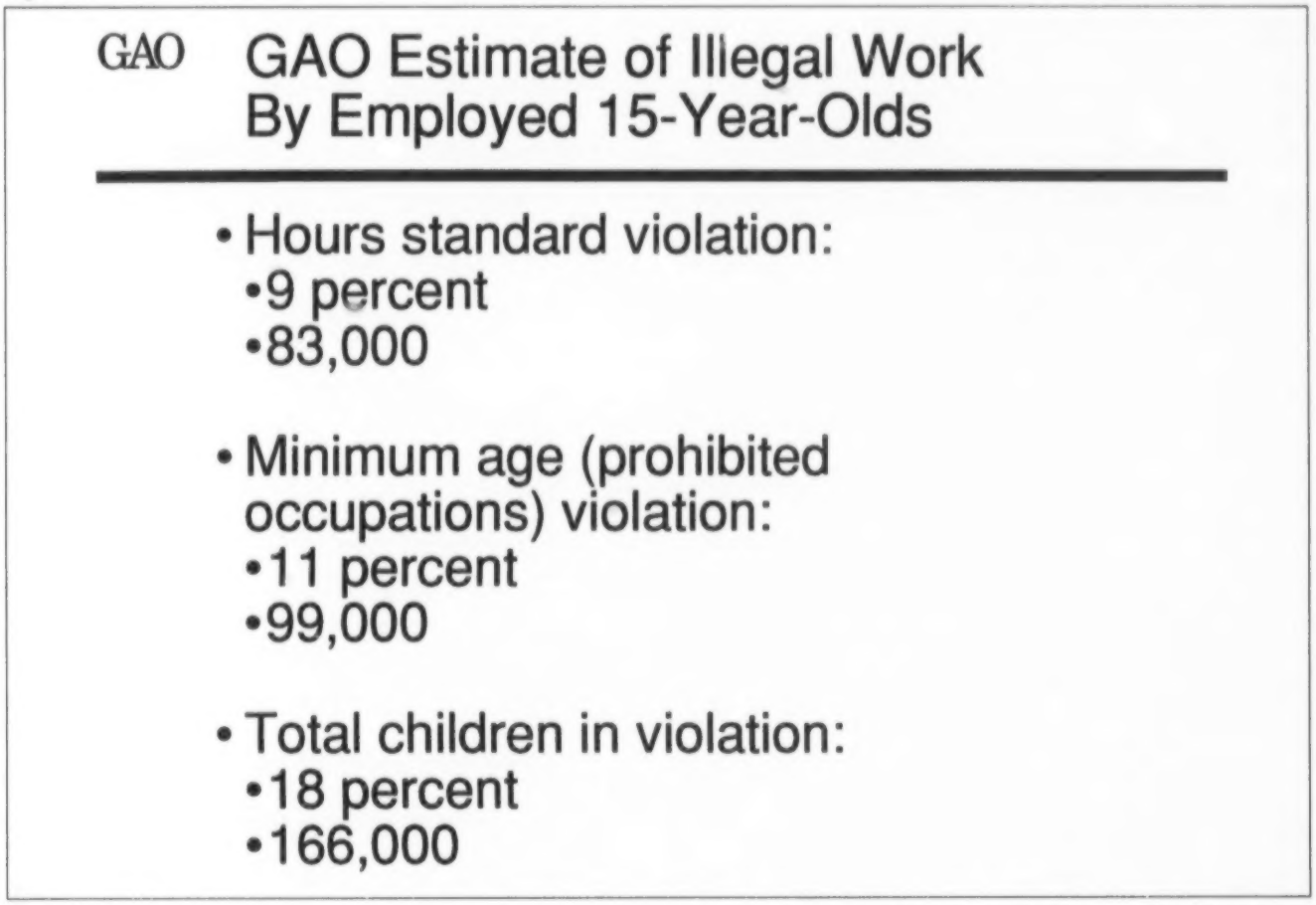
Note: Children from low-income families worked more hours a week but fewer weeks a year than children from high-income families. In 1988, children from families with annual incomes of $20,000 or less worked more hours (21.9 hours) than children from families with annual incomes of above $60,000 (18.5 hours). In contrast, children in the low-income group worked fewer weeks a year (19.5 weeks) than children from high-income families (22.9 weeks). Estimates of average hours and weeks are for 15- to 17-year-olds employed in nonagricultural industries. (See app. VI.)

Figure I.11:



Note: Children from low-income families were more likely to be employed in hazardous industries (20 vs. 13.5 percent). We define hazardous industries as agriculture and industries with many prohibited occupations. Labor's Bureau of Labor Statistics ranks agriculture above average in lost workday injury rates. We classified the manufacturing, construction, mining, public utilities, communications, and transport sectors as "hazardous" industries because they include much employment designated by Labor as prohibited occupations for 14- and 15-year-olds. We also included wholesale trade because it includes employment in warehousing, an occupation designated as hazardous by Labor for children under 18 years of age.

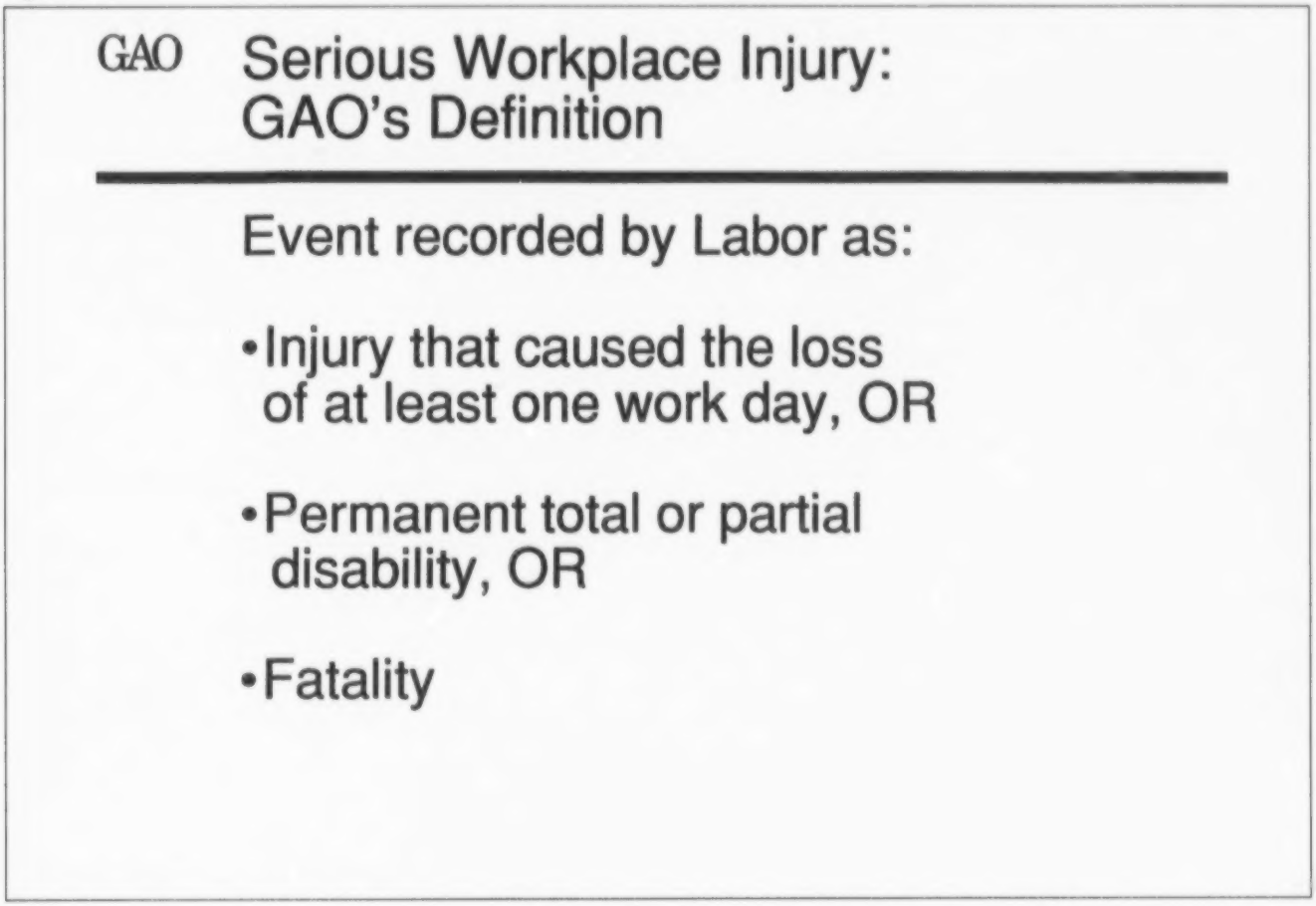
Figure I.12:



Note: The associated sampling errors ranged from +/-3.0 percent and +/-3.1 percent for violations of hours and minimum age standards to +/-4.1 percent for those employed in violation of at least one of the standards. (See app. VI.)

GAO's estimate of 166,000 illegally employed 15-year-olds in 1988 can be compared with the combined number of both 14- and 15-year-olds detected by Labor in violation of these standards in the same year: 11,953 children found violating the hours standard and 1,616 detected violating the minimum age standard—about 8 percent of the GAO estimate for 15-year-olds only.

Figure I.13:


GAO
Serious Workplace Injury:
GAO's Definition
Event recorded by Labor as:
•Injury that caused the loss of at least one work day, OR
•Permanent total or partial disability, OR
•Fatality

Note: This definition is consistent with Labor's records, which aggregate all three categories as detected serious injuries associated with a child labor violation. Labor does not record which are injuries, disabilities, or deaths.

Figure I.14:

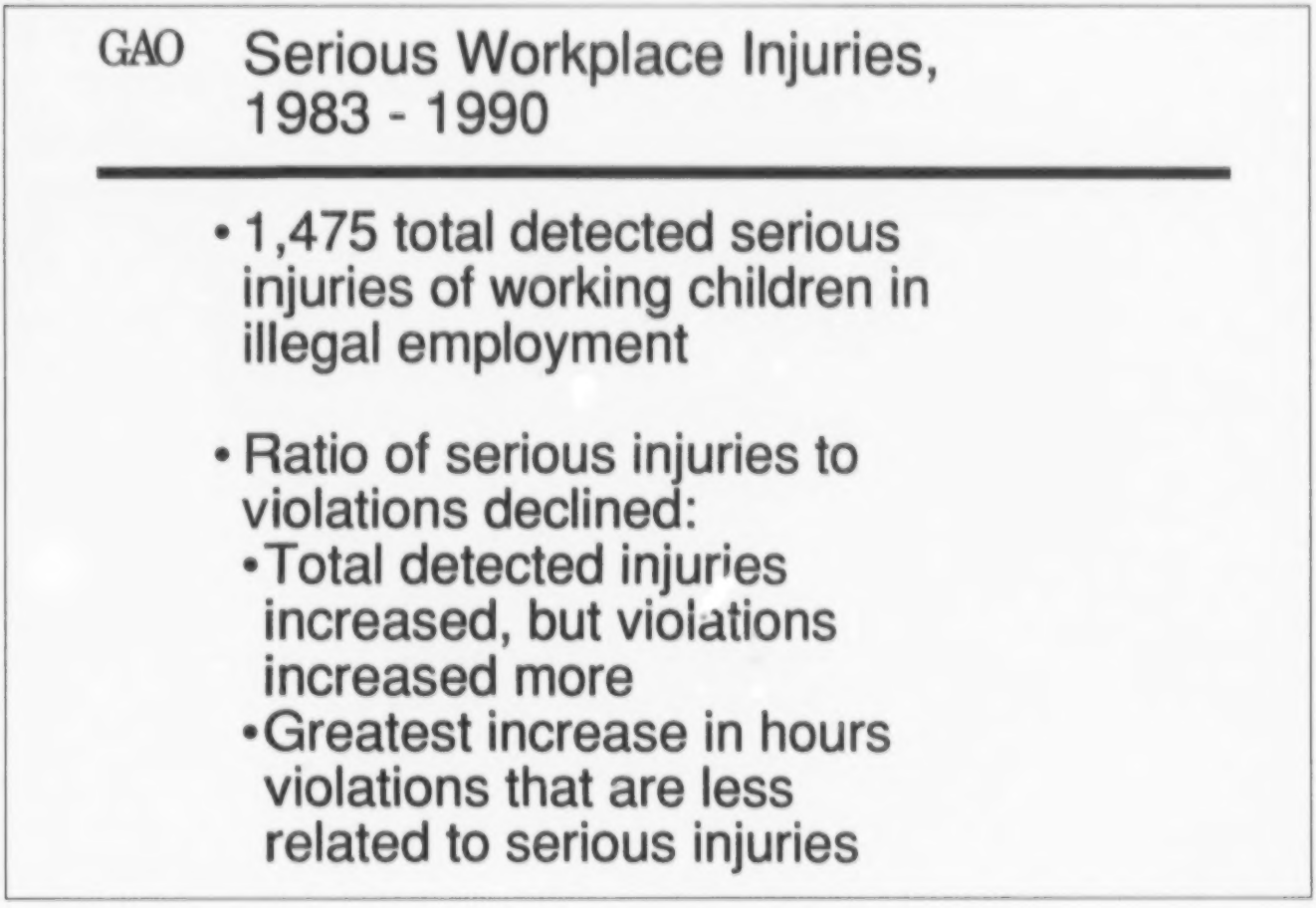
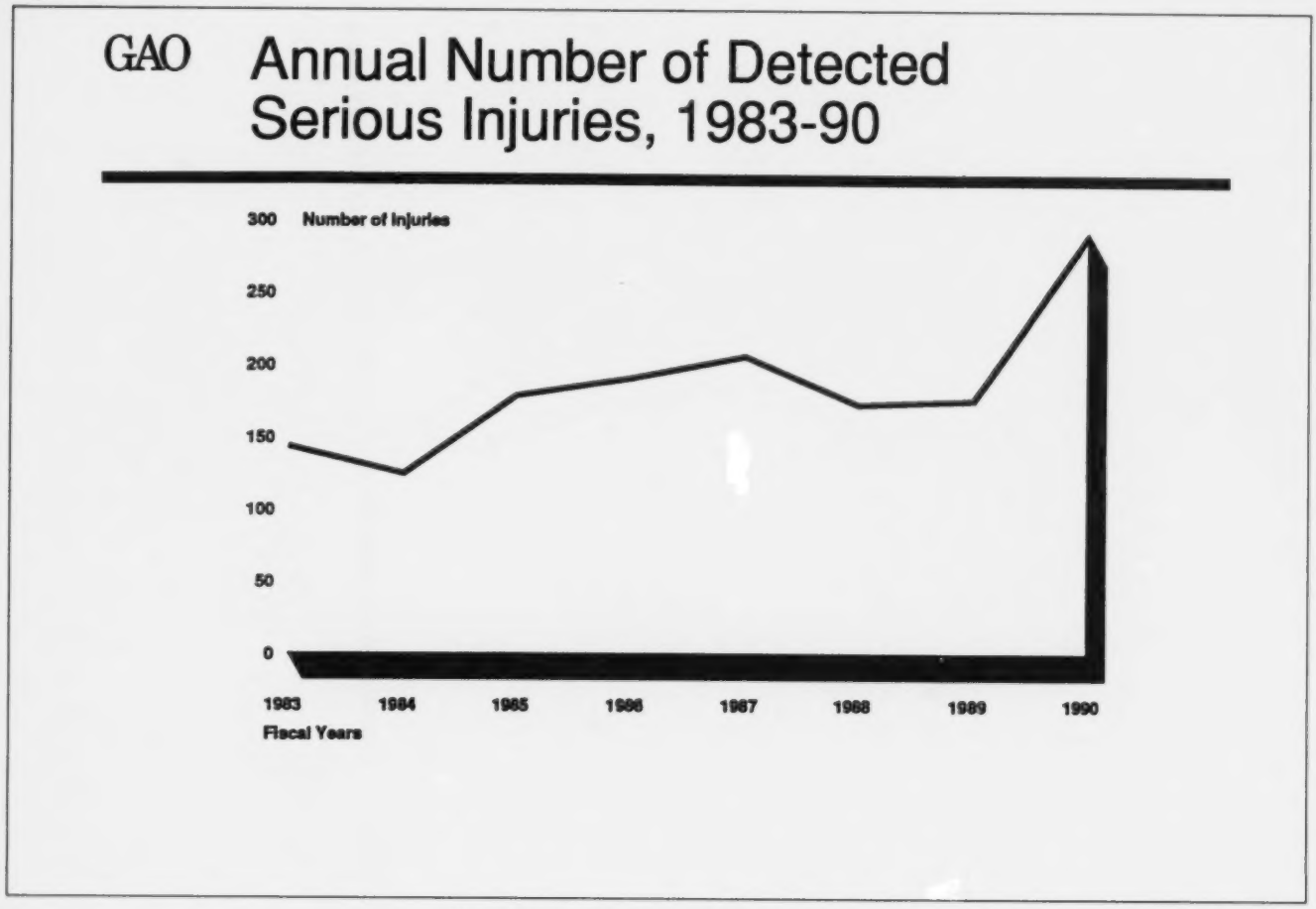
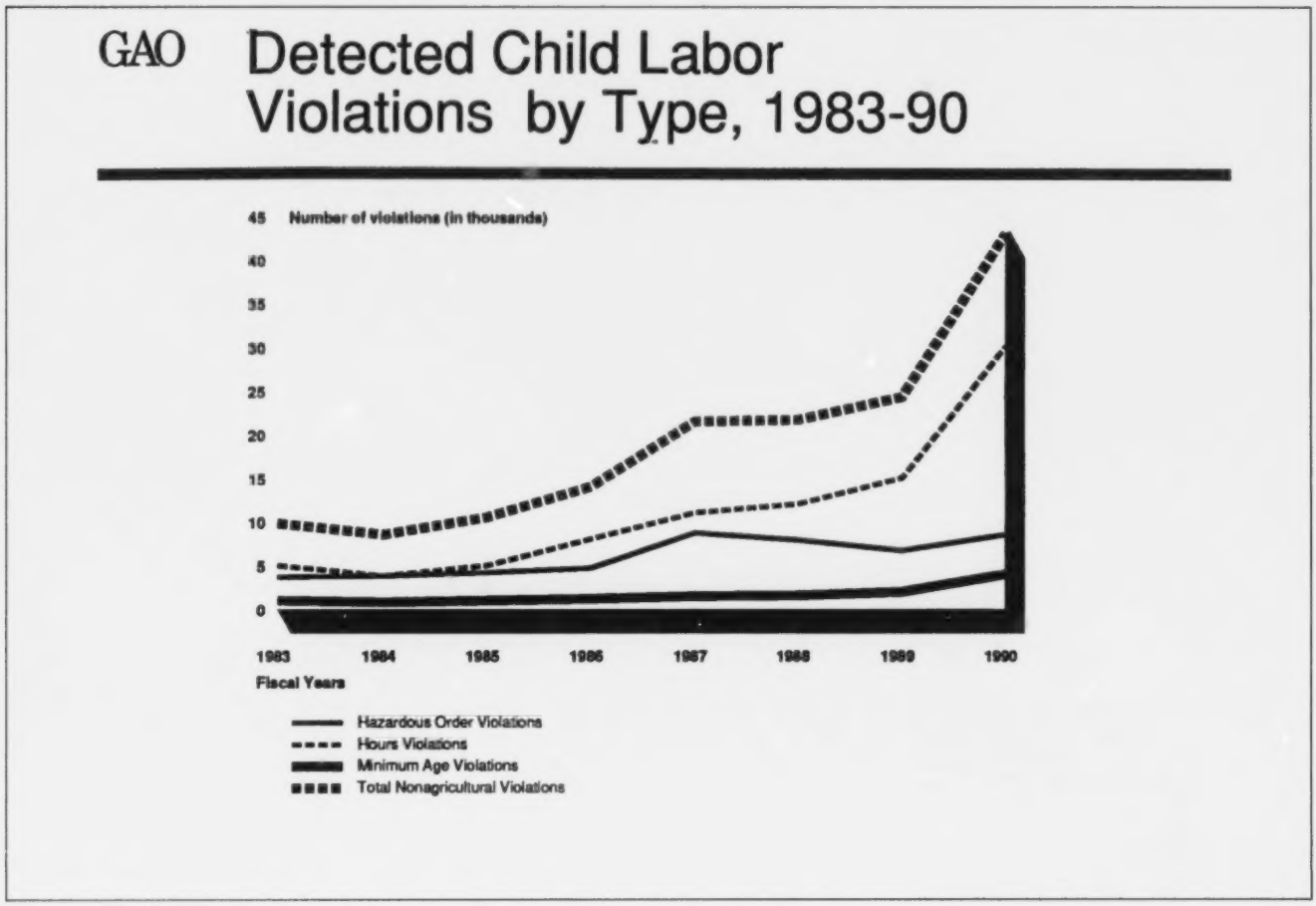

GAO
Serious Workplace Injuries, 1983 - 1990
• 1,475 total detected serious injuries of working children in illegal employment
• Ratio of serious injuries to violations declined:
• Total detected injuries increased, but violations increased more
• Greatest increase in hours violations that are less related to serious injuries

Figure I.15:



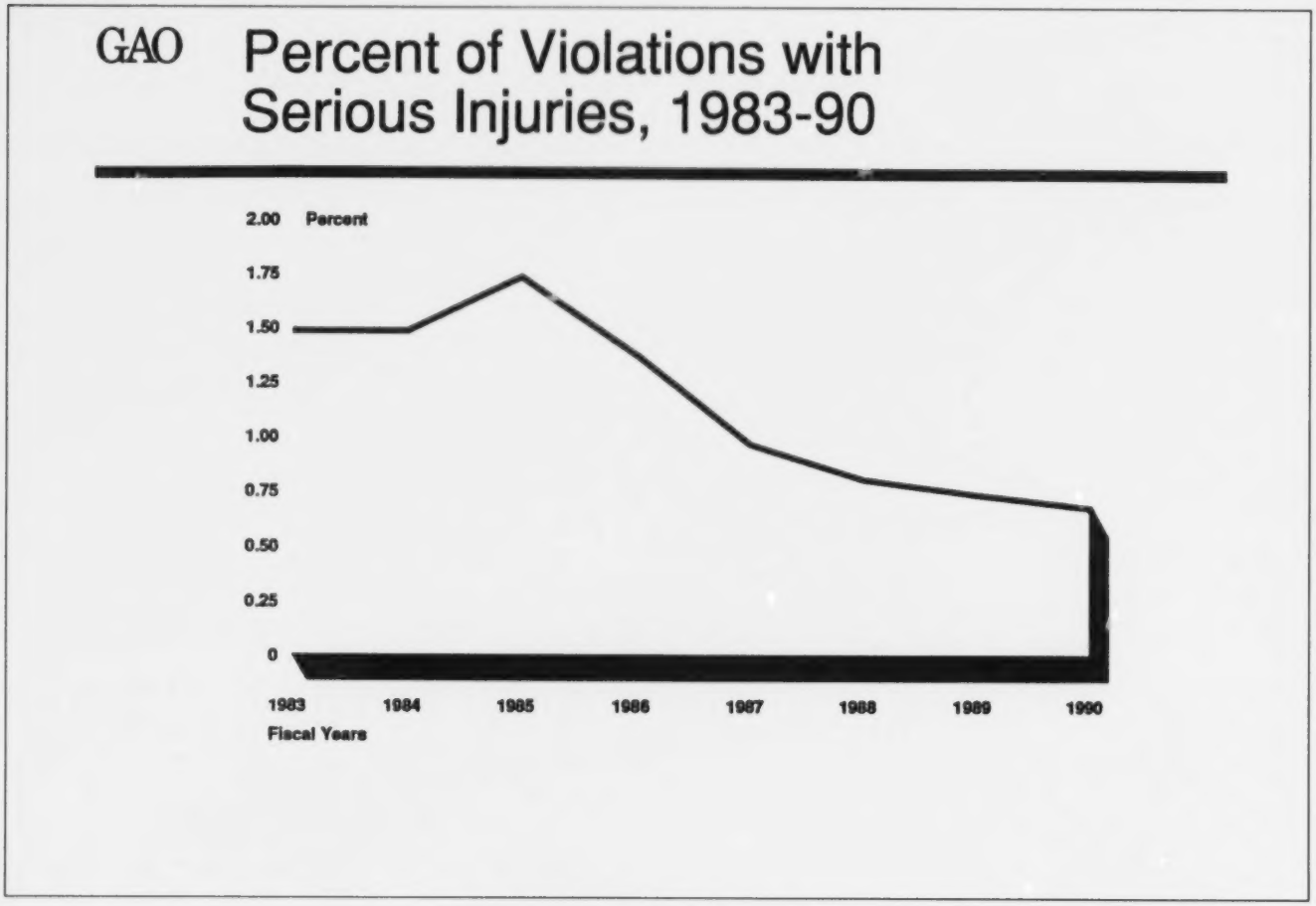
Note: In nonagricultural industries, the annual number of detected illegally employed children sustaining serious injuries increased over 100 percent between FY 1983 and FY 1990, from 143 to 288.

Figure I.16:



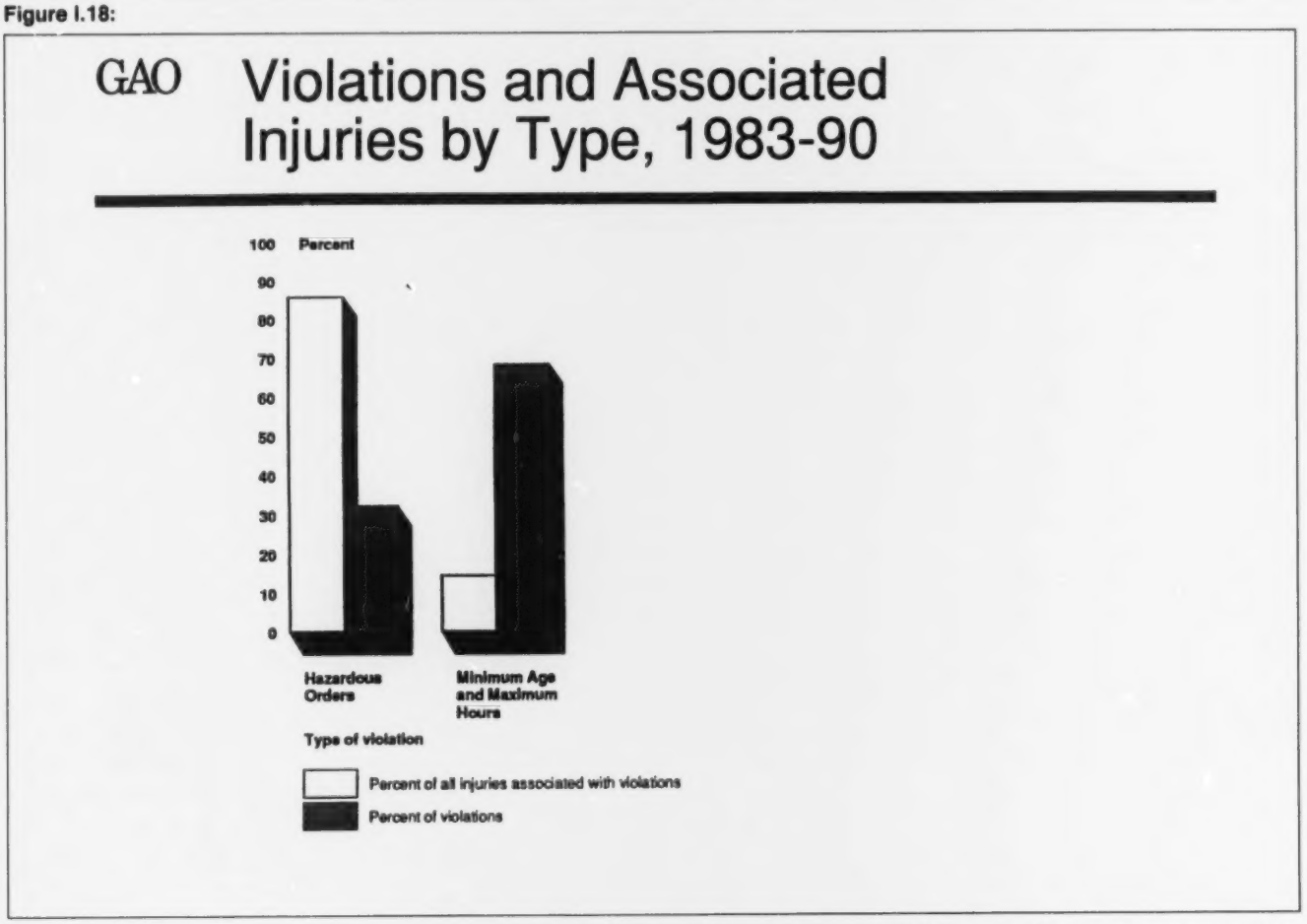
Note: In nonagricultural industries, the total number of detected child labor violations increased from 9,679 in FY 1983 to 42,696 in FY 1990. In addition, detected hours violations increased from 4,962 in FY 1983 to 30,220 in FY 1990.

Figure I.17:



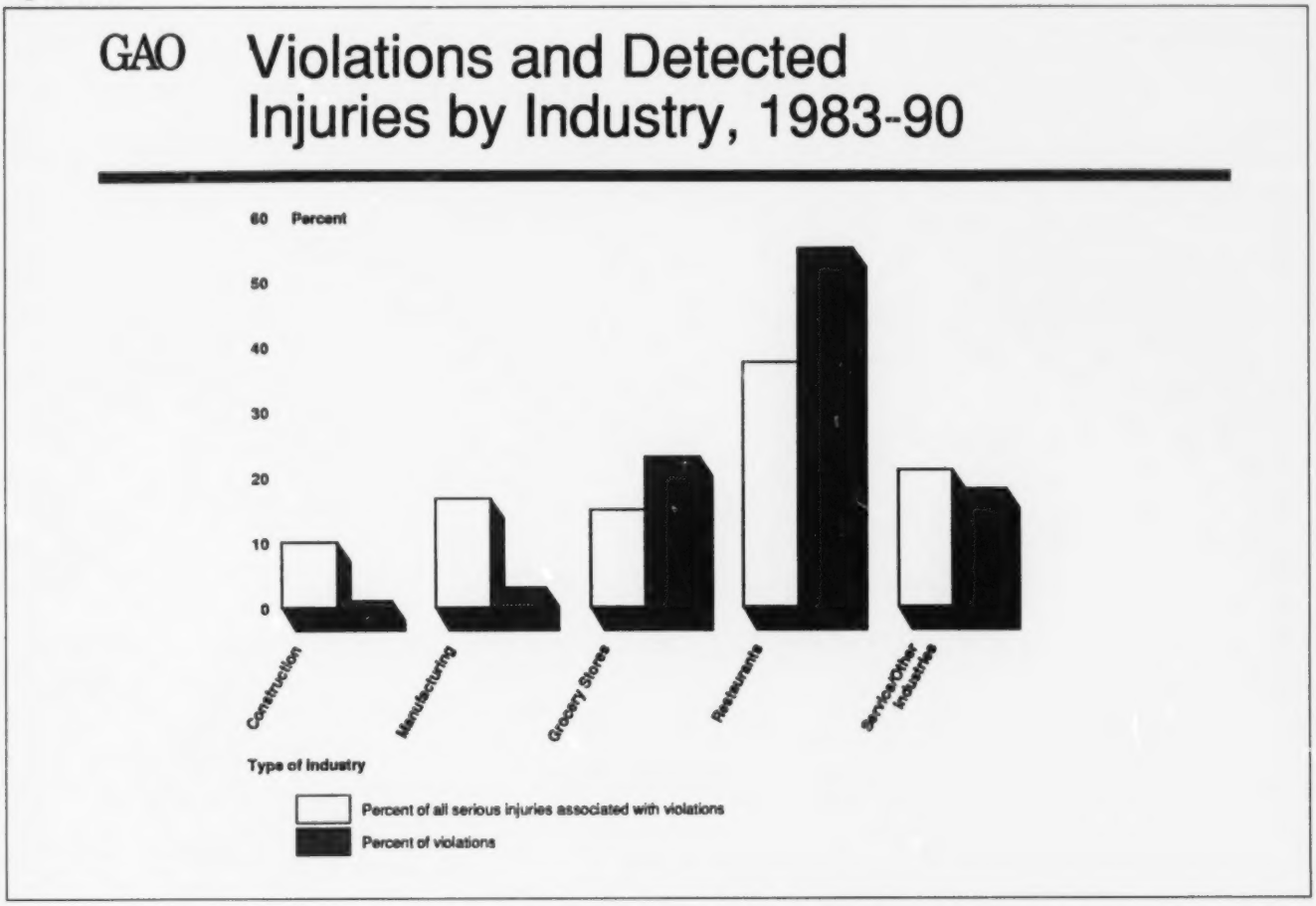
Note: In nonagricultural industries, the number of illegally employed children who sustained serious injuries as a percent of all child labor violations has declined since FY 1983, from 1.48 percent to .67 percent in FY 1990.

Figure I.18:



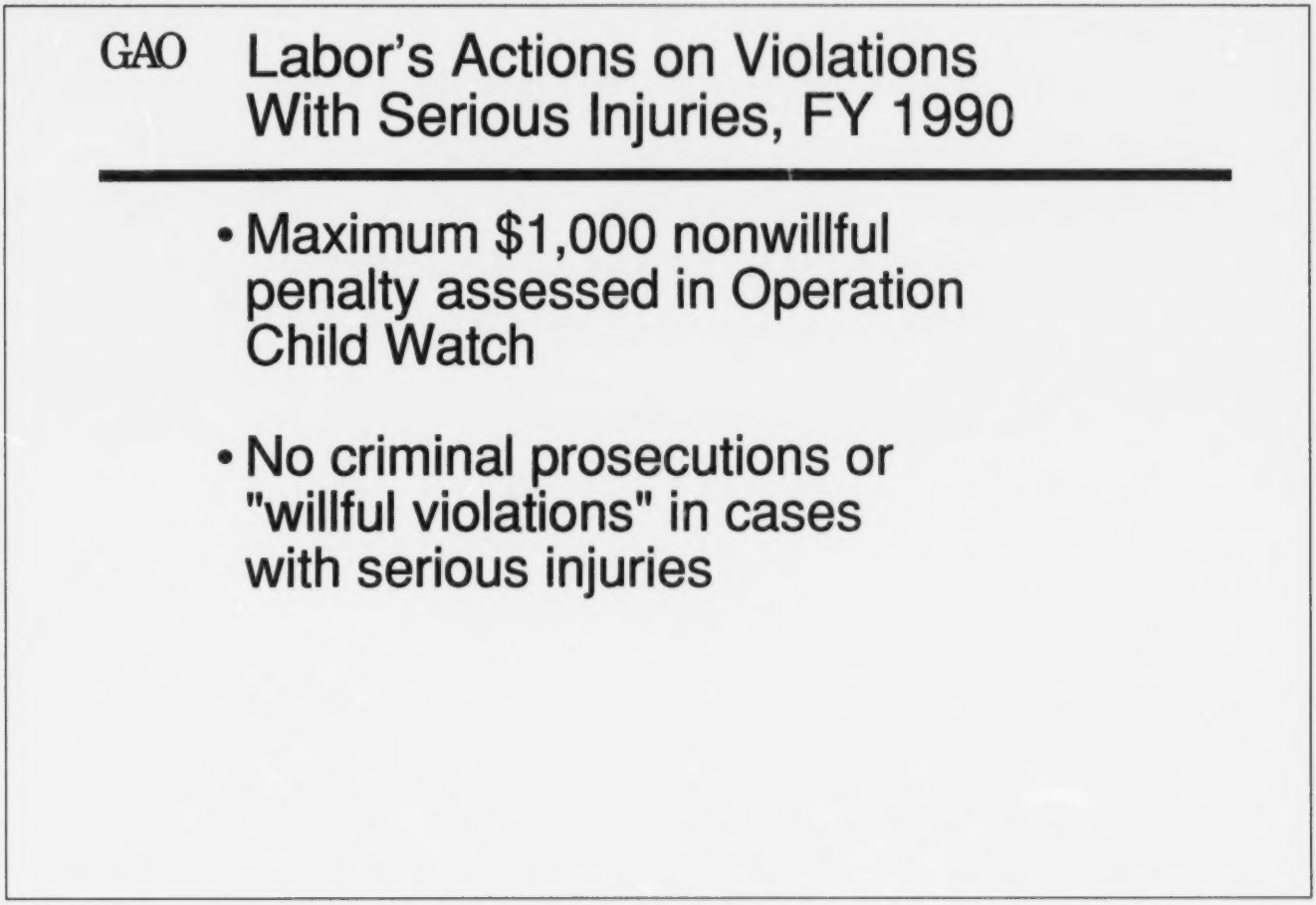
Note: Between FY 1983 and 1990, over 85 percent of all violations involving serious injuries were associated with hazardous order violations, although hazardous order violations comprised only 32 percent of all child labor violations. Less than 15 percent of all serious injuries were associated with minimum age and maximum hours violations, although they comprised 68 percent of all child labor violations.

Figure I.19:



Note: Although 4 percent of all child labor violations occurred in construction and manufacturing, about 27 percent of detected serious injuries were identified in these industries.

Figure I.20:


GAO
Labor's Actions on Violations With Serious Injuries, FY 1990
• Maximum $1,000 nonwillful penalty assessed in Operation Child Watch
• No criminal prosecutions or "willful violations" in cases with serious injuries

Note: Operation Child Watch is described in app. V.

Federal Child Labor Regulations for Nonagricultural Employment

Employment Standards for 14- and 15-Year-Olds

Under the provisions of the Fair Labor Standards Act of 1938 and subsequent amendments, the Secretary of Labor is authorized to regulate the employment of 14- and 15-year-old children in certain occupations to help ensure that such employment does not interfere with their schooling, health, or well-being.

Hours Standards

Regulations provide that 14- and 15-year-old children may not be employed

- during school hours, except as provided in work experience programs or before 7 a.m. or after 7 p.m., except 9 p.m. from June 1 through Labor Day;
- more than 3 hours a day on school days or more than 18 hours a week in school weeks; and
- more than 8 hours a day on nonschool days or more than 40 hours a week in nonschool weeks.

Minimum Age Provisions (Prohibited Occupations)

The FLSA generally sets a basic minimum working age of 16, although 14- and 15-year-old children may work in certain occupations. The prohibited occupations are as follows:

- Manufacturing occupations or any occupations in rooms or workplaces where manufacturing is taking place;
- Mining occupations or any occupations in rooms or workplaces where mining is taking place;
- Processing occupations, except as specified in food service, retail, and gasoline service firms;
- Public messenger service;
- Operation or tending of hoisting apparatus or any power-driven machinery;
- Any occupations found and declared to be hazardous; and
- Occupations in connection with transportation of persons or property, warehousing and storage, communications and public utilities, and construction, except as specified.

In general, 14- and 15-year-old children may be employed in selected occupations in retail, food service, and gasoline service establishments. However, they may not be employed in occupations in a retail, food service, or gasoline service establishment that involve

- work in or around boiler or engine rooms;
- maintenance or repair of machines or equipment;
- outside window washing involving working from window sills or requiring the use of ladders or scaffolds;
- cooking and baking (except at lunch counters, snack bars, fountains, or cafeteria serving counters);
- occupations involving the use of power-driven food slicers, grinders, choppers, cutters, and bakery-type mixers;
- work in freezers and meat coolers and work preparing meats for sale (except as specified in the regulations);
- loading and unloading goods to and from trucks, railroad cars, or conveyors; and
- warehouse work (except office and clerical work).

Hazardous Orders

The FLSA provides a minimum age of 18 years for employment in any nonagricultural occupations that the Secretary of Labor declares to be particularly hazardous. The 17 hazardous occupations orders now in effect apply on either an industry basis, specifying only these occupations in the industry that are not covered, or an occupational basis, prohibiting employment irrespective of the industry in which the occupation is found. The activities are as follows:

- Manufacturing and storing explosives;
- Motor-vehicle driving and outside helper;
- Coal mining;
- Logging and sawmilling;
- Operating power-driven woodworking machines;
- Employment resulting in exposure to radioactive substances;
- Operating power-driven hoisting apparatus;
- Operating power-driven metal-forming, punching, and shearing machines;
- Mining, other than coal mining;
- Slaughtering or meat-packing, processing, or rendering;
- Operating power-driven bakery machines;
- Operating power-driven paper products machines;
- Manufacturing brick, tile, and kindred products;
- Operating power-driven circular saws, band saws, and guillotine shears;
- Wrecking, demolition, and ship-breaking operations;
- Roofing operations; and
- Excavation operations.

Objectives, Scope, and Methodology

In their letter of August 9, 1990, Senators Christopher J. Dodd and Howard M. Metzenbaum, Chairs of the Subcommittees on Children, Family, Drugs and Alcoholism, and on Labor, respectively (both units of the Senate Committee on Labor and Human Resources), asked us to address the following issues (among others):

- The economic and demographic characteristics, or profile, of working children and
- The extent to which children under 18 have suffered serious bodily injuries in the course of their employment.

After subsequent discussions with the requesters, we agreed to review (1) the economic and demographic characteristics of child workers, (2) the number of serious injuries sustained by children detected by the Department of Labor as being illegally employed, and (3) Labor's actions with regard to penalizing employers illegally employing children who sustain serious injuries and to child labor violations generally.

To identify the best data available on the economic and demographic characteristics of working children, we held discussions with federal and state labor officials, including those at the Bureau of Labor Statistics and the Wage and Hour Division's Farm Labor, Child Labor, and Polygraph Standards Branch, and with academic experts and advocacy groups. From these discussions, we identified the annual March supplement of the Current Population Survey, produced by the Bureau of the Census, Department of Commerce, as providing the best data available. Also, to obtain information on workplace injuries sustained by detected illegally employed children, we analyzed injury data contained in Labor's Wage and Hour Management Information System (WHMIS).

We conducted our review between August 1990 and February 1991.

Use of the March 1989 CPS Supplement

CPS is the source of official government statistics on employment and unemployment and other labor market data for workers 15 years of age and older. It includes data on their employment situation and demographic status, such as age, race, sex, marital status, educational attainment, and family structure. The March CPS, also known as the Annual Demographic File, contains in addition to the basic monthly estimates, additional or supplemental data on work experience, income, noncash benefits, and other activity.

CPS Sample

The CPS sample is based on the civilian noninstitutional population located throughout the United States. Approximately 56,500 housing units containing 115,500 people 15 years of age and older are interviewed monthly. Households are scientifically selected on the basis of area of residence to represent the nation as a whole. Each household is interviewed once a month for 4 consecutive months and for the corresponding time period a year later.

The CPS also includes demographic data on approximately 33,500 children aged 0 to 14 and 650 armed forces members living with civilians. In March of each year, supplemental data are collected for armed forces members residing with their families and for a sample of Spanish-speaking households identified the previous November. Additional questions concerning work experience and other issues are referred to as March supplement items because these questions are only asked of households in the March CPS sample.

Limitations of the CPS

Although the CPS was the best data base for our use, it was limited in several ways, particularly with respect to workers 14 years of age and younger. Also, sampling limitations restricted our analysis to groups with a minimum reporting size that in some cases was larger than the groups we wished to analyze. Finally, research using the CPS primarily in the analysis of teenage unemployment suggests that the CPS likely understates the extent of youth employment. (See app. IV.)

The CPS supplement collects no information on workers 14 years of age and younger, even though employed 14-year-olds are an important group regulated by Labor and of interest to the requesters. In addition, the Bureau of the Census maintains that valid estimates cannot be made using the CPS when the population base is 75,000 or less. The Bureau recommends that users of CPS data exercise care when interpreting analysis results based on a relatively small number of cases or on small differences between estimates. Because of our focus on a relatively small proportion of the workforce (employed 15- to 17-year-olds), this limitation constrained our analysis of some subgroups of working children.[1] (See app. VI for the data and sampling errors associated with our analysis and the figures presented in app. I.)

[1]For example, the estimated number of employed Hispanic and "Other" 15-year-olds who were also in school totaled 49,572.

There is evidence that the CPS underestimates the extent of youth employment. Researchers have noted that labor force participation rates, employment-to-population ratios, weeks worked, and hours worked all are noticeably higher in longitudinal surveys than in the CPS.[2] The former interview the child directly about his or her work experiences, while the CPS relies on proxy respondents to report what youths do. For example, the CPS has a lower estimate of the number of employed young males than does the National Longitudinal Survey (NLS),[3] although the divergence shrinks as the children get older.

The CPS also has a lower estimate of weeks worked than does the NLS, with the greatest divergence among younger workers and employed children in school than among those not in school. Discussions with researchers familiar with both data bases indicate that the CPS also has a lower estimate of average weekly hours worked than the NLS.[4]

[2]For example, see:

(a) Richard B. Freeman and James L. Medoff, "Why Does the Rate of Youth Labor Force Activity Differ Across Surveys?" The Youth Labor Market Problem, Richard B. Freeman and David A. Wise, eds. (National Bur. of Economic Research, 1982), pp. 75-104;

(b) Paul O. Flaim and Stephen M. Hills, "Comments" (same volume), pp. 104-114;

(c) M.E. Borus, F. L. Mott, and G. Nestel, "Counting Youth: A Comparison of Youth Labor Force Statistics in the Current Population Survey and the National Longitudinal Surveys," The Ohio State University, Center for Human Resource Research (Columbus, Ohio: July 1978); and

(d) H. Woltman, "Comparison of Youth Employment Estimates from the CPS and the NCS" (Memorandum for Tom Walsh), (Washington, D.C.: U.S. Bureau of the Census, Statistical Methods Div., 1979).

[3]The employment/population ratios of the CPS and the NLS diverge by 9.7 to 11.2 percent for 16- to 17-year-olds, but by 4.6 to 10.0 points for 18- to 19-year-olds, the NLS being higher in all cases.

[4]Because we sought information on recent youth labor market activity, we did not use the NLS. The NLS sample was drawn from young men and women 14-21 years of age in 1979, with reinterviews in subsequent years. Thus, there were no 14- or-15-year-olds in the sample by 1988.

Labor's Wage and Hour Management Information System (WHMIS)

Although we know that many children are injured in the workplace, as noted in an earlier report,[5] no comprehensive, national, work-related injury and illness data exist for minors, including those illegally employed. However, we were able to identify some sources of data on workplace injuries of children, in particular the WHMIS.

The WHMIS data base contains information on all of WHD's FLSA investigations, including those on the minimum wage and child labor, for fiscal years 1983-90. WHMIS includes data on (1) the number of illegally employed children detected by Labor, (2) the number of child labor violations by type, region and industry, and (3) the total number, industry, and regional location of detected serious injuries sustained by illegally employed children and the violation associated with each injury. No information is provided, however, on the number of detected serious injuries by type. Thus, we could not determine how many serious injuries resulted in deaths or permanent disabilities, or even the average amount of work time lost by each seriously injured child.

In addition, WHMIS is limited in that lacks information on assessed child labor violation penalties and related data for individual cases, in particular those involving the serious injuries of illegally employed children. In large part, this information remains in case files throughout the nation, not readily available to Labor headquarters or other researchers. However, we obtained assessed penalty information for injuries detected during Labor's fiscal year 1990 Operation Child Watch enforcement sweep actions. (See app. V for a summary of Labor's Operation Child Watch enforcement efforts.) These data included (1) the penalty assessed for each serious injury as well for all other violations, (2) the number of children and violations involved in each investigation including a serious injury, and (3) the industry and state in which the illegally employed child with an injury was found. In addition, for a selected number of cases, we were able to determine the amount of work time lost and the nature of the injury.

We obtained information about Labor's penalty assessment policy regarding violations where an illegally employed child has sustained a serious injury and what changes Labor plans to make in response to the new $10,000 maximum civil penalty legislated by the Congress for nonwillful violations. Other data was gathered on the numbers of criminal prosecutions initiated by Labor against child labor violators in fiscal

[5]Child Labor: Increases in Detected Child Labor Violations Throughout the United States (GAO/HRD-90-116, Apr. 30, 1990).

year 1990 (including cases involving the serious injury of an illegally employed child) and injunctions initiated by Labor against national firms.

GAO Estimate of Illegal Employment of 15-Year-Olds

Despite concern over the growth in child labor violations,[1] to our knowledge there are no national estimates of the number of children involved in such violations. Using data from the 1989 Annual March Supplement to the Current Population Survey, we estimated the number of 15-year-olds illegally employed in 1988 under the federal regulations governing either (1) maximum work hours or (2) minimum age/prohibited occupations for 15-year-olds employed in nonagricultural industries.[2]

Existing Federal Child Labor Regulations

Federal regulations provide that 14- and 15-year-old children working in nonagricultural industries may not be employed (1) during school hours, (2) before 7 a.m. or after 7 p.m. or for more than 3 hours a day on school days, or (3) more than 18 hours in school weeks. In addition, they may not work more than 8 hours a day or 40 hours a week during nonschool days and weeks nor after 9 p.m. from June 1 through Labor day. Federal regulations also prohibit 14- and 15-year-olds from employment in (1) all manufacturing and mining occupations; (2) with certain exceptions, construction, transport, public utilities, and communications occupations; and (3) a number of occupations in retail, warehousing, and food service.

Violations of Federal Hours Regulation

To estimate the number of school children employed in violation of the federal maximum hours regulation, we first estimated the total number of 15-year-olds illegally employed according to the regulation in 1988. We then adjusted the estimate for the number of children excluded by the child labor provisions of the Fair Labor Standards Act.

[1]See Child Labor: Increases in Detected Federal Child Labor Law Violations (GAO/HRD-90-116, Apr. 1990).

[2]We did not attempt to estimate the extent of illegal employment of 16- and- 17-year-olds. Federal child labor regulations do not restrict the hours of employment for 16- and 17-year-olds, although these children are prohibited from employment in certain "hazardous occupations." However, these hazardous occupations are typically narrower in scope than the occupations specified as prohibited for 14- and 15-year-old children and the CPS does not define or describe its occupational classifications to permit a matching with Labor's hazardous occupations.

From the CPS, we identified the numbers of 15-year-olds employed in nonagricultural industries who worked

- more than 40 hours a week during any week in the year and
- at least 19 hours a week but no more than 40 hours a week for 16 weeks or more (using 16 weeks of employment to approximate the length of the nonschool period of the year).[3]

Summing these members gave us an unadjusted estimate of 94,826 15-year-olds working in violation of the federal hours regulation, a figure we corrected for likely coverage by the FLSA.[4] Using Department of Labor estimates for the percentage of the workforce not covered under FLSA minimum wage provisions, we estimated the percentage of working children not covered by FLSA's child labor provisions. This correction left us with 83,216 employed 15-year-olds or about 9 percent of all 15-year-olds employed in nonagriculture and agricultural industries in 1988. At the 95-percent confidence level, the associated sampling error was +/-3.1 percent.

Violations of Federal Minimum Age/Prohibited Occupation Regulation

To determine the number of children working in violation of the minimum age regulation in 1988, we first identified the primary industry of employment for each 15-year-old who worked in 1988. Summing the number of 15-year-olds employed in manufacturing, construction, mining, public utilities, communication, and transport industries, we obtained our unadjusted estimate of 112,871 children. Second, we again adjusted our estimate for FLSA coverage. The remaining 99,051 employed 15-year-olds represented about 10.8 percent of all 15-year-olds employed in nonagriculture and agricultural industries in 1988. At the 95-percent confidence level, the associated sampling error was +/-3.0 percent.

[3]The CPS does not indicate the number of hours a child works by time of year; for example the amount of employment during the summer as opposed to the school year.

[4]Not all employers are covered by the FLSA. The primary determinant of coverage by the child labor provisions of the FLSA is whether the employer is engaged in interstate commerce, which in many cases means total annual sales of over $500,000. The act still may cover a child employed by a firm not engaged in interstate commerce, however, if that child is individually engaged in interstate commerce during employment. Assuming that all employed 15-year-olds were nonsupervisory workers, we corrected for the act's coverage by adjusting our estimates with the percentage of all nonsupervisory workers covered by the minimum wage provisions of the FLSA.

Total Amount of Illegal Employment

To get an estimate of the amount of illegal employment under both provisions, we summed both unadjusted estimates, subtracting the number of children who were counted in both estimates. This left an unadjusted estimated total of 188,881 children. Adjusting for FLSA coverage, we estimate that 165,754 15-year-olds, or about 18 percent of all employed 15-year-olds, were employed illegally at least part of the time in 1988. At the 95-percent confidence level, the associated sampling error was +/-4.1 percent.

Estimate May Understate Illegal Employment of 15-Year-Olds

We believe that, overall, our estimate understates the number of illegally employed 15-year-olds, for three reasons:

1. The CPS data base itself may yield an underestimate of illegal employment. There is evidence that the CPS underestimates the number of children who work and the amount of work in hours and weeks (see app. III). Therefore, all our estimates of illegal employment may be low.

2. The CPS also does not indicate the number of hours a child works daily or the time of day during which the work occurred. Thus, we could not estimate illegal employment of over 8 hours a day or illegal night employment. To the extent that considerable numbers of children may be working in violation of these provisions, our estimate of the number of children violating the federal hours standard is too low.

3. In estimating employment in violation of the federal minimum age regulation, we could not include children employed in prohibited activities in otherwise allowed industries. For example, we did not include children operating meat slicers in the retail and food service industries.

On the other hand, some data limitations cause our figures to overestimate illegal employment. For example, our estimate of employment in violation of the minimum age standard includes some children who may be employed in a legal occupation in an industry composed primarily of prohibited occupations. Fifteen-year-olds may be legally employed as sales or office workers in construction, as long as they work away from the construction site.

In addition, while we corrected for the general coverage of the FLSA, the act also exempts some children in certain occupations. For example, while children employed as actors or performers in the motion picture industry or in theatrical, radio, or television production might meet the

act's interstate commerce requirement for coverage, they are specifically exempted.[5] We feel, however, that the number of children inappropriately included in our estimate is much smaller than the number missed.

[5]Nonagricultural federal child labor protections do not apply to children engaged in the delivery of newspapers to the consumer; employed by their parents in occupations other than manufacturing or mining or in hazardous occupations; and engaged in the making of evergreen wreaths at home. We believe that some of these exemptions, like wreath-making and acting, affect few children. Also, parental exemption does not cover employment in mining or manufacturing, two key industries we included in our minimum age/prohibited occupation estimate.

Summary of Labor's Operation Child Watch Enforcement Efforts (FY 1990)

In 1990, the Department of Labor initiated a series of four nationwide strike force efforts to uncover child labor violations and take remedial actions against child labor law violators. Operation Child Watch efforts, most of which lasted 1-3 days, were conducted in March, June, August, and September of 1990. As of February 1991, Labor had no plans for additional Child Watch operations and the Director of Labor's Farm Labor, Child Labor, and Polygraph Standards Division stated that they would concentrate future enforcement efforts at the local and regional levels.

Information on inspections conducted under Operation Child Watch is included in Labor's Wage and Hour Division's Management Information System data base for fiscal year 1990. This permits a comparison of Operation Child Watch's efforts with Labor's cumulative annual report on child labor enforcement activities. In addition, Labor has maintained separate, more detailed information on the investigations conducted during Operation Child Watch, including the assessed penalty for each violation and any serious injury associated with it.

Number of Investigations and Violations

Department of Labor statistics show a disproportionate number of violations detected during Operation Child Watch compared with all child labor violations detected by Labor during fiscal year 1990. Of the total enforcement activity during fiscal year 1990, Operation Child Watch accounted for 65 percent of the total number of investigations where violations were detected. In addition, 76 percent of hours violations and 71 percent of minimum age/prohibited occupations violations were detected. (See table V.I)

Table V.1: Results of Operation Child Watch Enforcement Efforts Compared With All FY 1990 Child Labor Enforcement Activity by the Department of Labor

Effort/result	Operation Child Watch	Total FY 1990 activity	Child Watch as percent of total
Investigations	9,524	41,782	22.8
Investigations with violations	3,846	5,889	65.3
Violations detected:			
Hours violations	22,847	30,220	75.6
Hazardous order violations	3,763	8,506	44.2
Minimum age violations	2,809	3,970	70.8
Total	**29,419**	**42,696**	**68.9**
Illegally employed children	27,634	38,083	72.6
Detected serious injuries associated with violations	50	288	17.4

Serious Injuries

During Operation Child Watch, Labor made some innovative efforts to detect serious injuries among illegally employed children.[1] Nonetheless, OCW uncovered significantly fewer serious injuries associated with detected violations (17 percent of all detected serious injuries associated with 69 percent of all violations) than in all its fiscal year 1990 efforts.

We used Labor's definition of an injury, disability, or death to define a serious injury. Thus, we counted as a serious injury any event recorded by Labor during its child labor investigations that resulted in either an injury that caused the loss of at least 1 working day by the child, a permanent total or partial disability, or a fatality.

[1]During the sweep operations, for example, compliance officers in Labor's Region III used workers' compensation data from Pennsylvania to detect serious injuries that may have occurred in violation of a federal child labor standard. Of OCW's 50 detected serious injuries of illegally employed children, 22 were located in Pennsylvania. In Labor's Region IX in California, compliance officers used state work permit records to identify locations of likely child labor violations.

Data Points for Figures

Table VI.1: Data for Figure I.7: Low-Income Children Less Likely To Be Employed, 1988

Annual family income level	Percent of 15- to 17-year-olds employed	All 15- to 17-year-olds	All employed 15- to 17-year-olds
$20,000 or below	32	3,015,827	964,490
Above $60,000	54	1,884,468	1,026,407

Note: The estimated sampling errors ranged from +/-2.6 percent for children from families with incomes of $20,000 or less to +/- 3.5 percent for children from families with incomes above $60,000.

Table VI.2: Data for Figure I.8: Minority Children Less Likely To Be Employed, 1988

Race	Percent of 15- to 17-year-olds employed	All 15- to 17-year-olds	All employed 15- to 17-year-olds
Whites	49.7	7,265,263	3,608,662
Blacks	27.9	1,599,825	446,418
Hispanics	27.6	995,261	275,060
Others	34.2	407,969	139,590

Note: The estimated sampling errors ranged from +/-1.8 percent for whites to +/-7.1 percent for others.

Table VI.3: Data for Figure I.10: Average Hours and Weeks Worked by Family Income, 1988

	Bar	
15- to 17-year-olds' average hours/weeks worked	1	2
Hours[a]	21.9	18.5
Weeks[a]	19.5	22.9

Bar labels

1. Family income of $20,000 or less
2. Family income above $60,000

[a]Differences significant at the 95-percent confidence level.

Note: Sampling errors ranged from +/-1.9 to 2.3 hours worked and from +/-2.1 to 2.4 weeks worked.

Table VI.4: Data for Figure I.11: Employment Location for High- And Low-Income Children, 1988

Percent of 15- to 17-year-olds employed in industry	Bar 1[a]	Standard error	Bar 2	Standard error
Hazardous industries[b]	20.4	4.2	13.5	3.5
Retail trade	44.5	5.2	51.5	5.1
Services, government, other	35.1	5.0	35.1	4.9

[a]Totals may not equal 100 percent because of rounding.

[b]Differences significant at the 95-percent confidence level. "Hazardous" industries include mining, manufacturing, construction, public utilities, communications, transport, and wholesale trade.

Bar labels

1. Family income of $20,000 or less
2. Family income above $60,000

Table VI.5: Data for Figure I.15: Annual Number of Detected Serious Injuries, 1983-90

Fiscal year	Serious injuries
1983	143
1984	124
1985	178
1986	190
1987	205
1988	172
1989	175
1990	288

Table VI.6: Data for Figure I.16: Detected Child Labor Violations by Type, 1983-90

	Violations			
Fiscal year	1	2	3	4
1983	3,679	4,962	1,038	9,679
1984	3,821	3,750	812	8,383
1985	4,181	5,088	1,032	10,301
1986	4,725	7,937	1,193	13,855
1987	8,710	11,174	1,479	21,363
1988	7,946	11,953	1,616	21,515
1989	6,767	15,344	1,986	24,097
1990	8,506	30,220	3,970	42,696

Line labels

1. Hazardous order violations
2. Hours violations
3. Minimum age (prohibited occupation) standards
4. Total nonagricultural violations

Table VI.7: Data for Figure I.17: Percent of Violations With Serious Injuries, 1983-90

Fiscal year	Ratio
1983	1.48
1984	1.48
1985	1.73
1986	1.37
1987	.96
1988	.80
1989	.73
1990	.67

Table VI.8: Data for Figure I.18: Violations and Associated Injuries by Type, 1983-90

	Bar	
Type of violation	**1**	**2**
Hazardous order	85.7	32
Minimum age and hours standard	14.3	68

Bar labels

1. Percent of serious injuries associated with violations
2. Percent of violations

Table VI.9: Data for Figure I.19: Violations and Detected Injuries by Industry, 1983-90

	Bar	
Industry	**1**	**2**
Construction	10.0	1.0
Manufacturing	16.7	3.0
Grocery stores	14.9	23.0
Restaurants	37.5	55.0
Service/other industries	20.9	18.0

Bar labels

1. Percent of serious injuries associated with violations
2. Percent of violations

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Child Labor: Increase in Detected Child Labor Violations Throughout the United States (GAO/HRD-90-116, Apr. 30, 1990).

Child Labor Violations and Sweatshops in the U.S. (GAO/T-HRD-90-18, Mar. 16, 1990).

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